

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

| | | |
|------------------|---|----------------------|
| Title | <input type="text" value="Mr"/> | <input type="text"/> |
| First Name | <input type="text" value="Cormac"/> | <input type="text"/> |
| Last Name | <input type="text" value="Rooney"/> | <input type="text"/> |
| Job Title | <input type="text" value="Director"/> | <input type="text"/> |
| Organisation | <input type="text" value="MJ Rooney Construction Ltd"/> | <input type="text"/> |
| Address Line 1* | <input type="text" value="██████████"/> | <input type="text"/> |
| Address Line 2 | <input type="text" value="██████████████████"/> | <input type="text"/> |
| Post Town* | <input type="text" value="██████"/> | <input type="text"/> |
| Post Code* | <input type="text" value="██████"/> | <input type="text"/> |
| Telephone Number | <input type="text" value="██████████"/> | <input type="text"/> |
| E-mail Address | <input type="text" value="██████████████████"/> | <input type="text"/> |

Part B – Please use a separate page for each representation

Name or Organisation: M J Rooney Construction Ltd

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

Documents can be found at the following links:

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

| | | | | | |
|------------|--|--------|--------------|--------------|--|
| Paragraphs | C3, C4, D, E3, 12.131, 12.141, 12.142, 12.143, 12.144, 12.145 | Policy | D6 Basements | Policies Map | |
|------------|--|--------|--------------|--------------|--|

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

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

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

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

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

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

*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

Our company have been trading for nearly 40years in the Basement Industry and currently employs around 50 people.

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](#).

| | | | |
|-----------------------|--|--------------|----------------------------|
| 11. Signature: |  | Date: | 26 th June 2025 |
|-----------------------|--|--------------|----------------------------|

Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

- ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

Responder 479

Date: Fri, 27 Jun 2025 10:49:15 +0100

From: Julia Eccleshare

To: [redacted]

Subject: Camden Local Plan- representation form to proposed submission draft 2025

Attached is a response to the Draft Local Plan from Egovra

I have also attached a handwritten signature in case that is necessary

yours,
Julia Eccleshare

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

| | | |
|----------------------------------|---|----------------------|
| Title | <input type="text" value="Ms"/> | <input type="text"/> |
| First Name | <input type="text" value="Julia"/> | <input type="text"/> |
| Last Name | <input type="text" value="Eccleshare"/> | <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

Elaine Grove and Oak Village Residents' Association

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

Documents can be found at the following links:

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

Paragraph Policy Policies Map

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

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

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

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

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

| | |
|---|--|
| (1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements) | <input style="width: 100px;" type="text" value="x"/> |
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| (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"/> |
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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.

There is effectively no site allocation policy for site C23 (Bacton Low Rise) as the developer (Camden) has abandoned the second (unbuilt part) of the scheme covered by the planning permissions listed in this draft plan. In 2024 Camden and new partners Mount Anvil started pre planning consultation exercises on a completely different scheme unrelated to the previous site allocation policy and taking advantage of the planned potential for tall buildings on the site.

(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 site allocation policy for site C23 should be produced and consulted on.

As Camden is both the planning authority and a development partner (with details of the partnership arrangement unknown) transparency on the policy guidelines for this site is particularly important.

The site allocation policy for the site should include but not be restricted to:

- Safeguarding the setting and the interior amenity of the Grade 1 listed St Martin's Church.
- Tall buildings on the site and include recommendation of the Camden Building Heights Study Final Report [4307_20240110_Camden Building Height Study_Final Report_Low res.pdf](#)
- The open railway cutting to the north of this site and effect of noise produced by fast trains both directly in balconies and indirectly by "bouncing" off adjacent buildings in nearby open spaces (eg Lismore Circus).

(Continue on a separate sheet if necessary)

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

No

Yes

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

To ensure local voices are heard as well as read.

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.

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| | |
|---|---|
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| (c) when the Camden Local Plan is adopted | Y |

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| | | | |
|-----------------------|-------------------------|--------------|--------------------|
| 11. Signature: | Julia Eccleshare | Date: | 26 Jun 2025 |
|-----------------------|-------------------------|--------------|--------------------|

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- ***Justified***

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| | | | |
|----------------|---|-------|-------------|
| 11. Signature: |  | Date: | 26 Jun 2025 |
|----------------|---|-------|-------------|

Responder 480

Date: Fri, 27 Jun 2025 11:04:33 +0100
From: Harriet Bevan
To: [redacted]
Subject: Nature Corridor

Dear Camden Planners

We live at [redacted address] and are 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,

Harriet Bevan

Responder 481

Date: Fri, 27 Jun 2025 11:05:07 +0100

From: Joseph Lebus

To: [redacted], [redacted]

Subject: OPPOSITION TO THE RELOCATION OF THE REGIS ROAD REUSE AND RECYCLING CENTRE TO THE KENTISH TOWN POLICE STATION SITE

My reasons are below:

1. Proximity to our homes, schools and businesses

The Kentish Town Police Station site is surrounded by homes on Holmes Road, York Mews and the Inkerman Conservation Area, a quiet residential neighbourhood. It is also less than 1200 meters from the town centre area of Kentish Town Road and its cafes and shops. Several schools and community assets are also located on Holmes Road. Relocating the Recycling Centre on the Police Station site would negatively impact the quality of life of local residents and the overall attractiveness of the area.

2. Health and environmental concerns

Relocating the Recycling Centre on the Kentish Town Police Station site would highly likely cause noise pollution, air pollution, heavy traffic disturbance as well as nuisance smells. These are serious risks to public health and safety in the area.

3. Damage to community character and value

Kentish Town has a strong local identity. Relocating a Recycling Centre into its heart would risk undermining Camden's own regeneration goals for the area, damaging its character and would highly likely negatively impact assets of the Local Community.

4. Lack of meaningful consultation

The information related to the proposed Police Station site as the location of a re-provisioned Recycling Centre was for the first time introduced in the final and "adopted" version of the Regis Road Area Guidance dated 10 March 2025. This information was not made public in any of the prior public consultations. This has denied the Local Community a fair opportunity to respond to this critical aspect of development plans for the neighbourhood.

WHY THIS MATTERS

Kentish Town is a vibrant, diverse community with a strong sense of identity. Re-provisioning the Recycling Centre in its heart would harm our town centre, our homes and possibly damage the local environment and put at risk the health and safety of residents and workers alike. The Local Community considers these risks to be material. We ask Camden Council to protect our neighbourhood and work with us to find a better, long-term solution in relation to the Recycling Centre for the benefit of all local stakeholders.

Many thanks,
Joseph Lebus

[REDACTED]

Responder 482

Date: Fri, 27 Jun 2025 11:05:47 +0100
From: Catriona Gray
To: [redacted]
Subject: Refuse dump on Holmes Road

I want to formally log an objection to the proposed plans to move the refuse site from Regis Road to Holmes Road.

It is clearly being done to appease the developer of the Regis Road site. They don't want it near their new flats because it will devalue them. Meanwhile people who have lived on Holmes Road and nearby roads for decades will see *their* house prices go down.

You could call this like for like but it's not. Putting a dump right opposite a primary school is totally unacceptable. Accidents WILL happen will increased and heavier traffic, plus the obvious health impact of children breathing pollution from heavy goods vehicles right by the playground.

The current site poses no health risk to children.

I thought Camden was committed to healthy school streets? You'll put it in place for the privately run French school nearby but jeopardise the health of the less wealthy children at St Patrick's.

Shame on Camden for pandering to the developer and not considering long time local residents and CHILDREN.

I have nothing personal to gain from this, my children are not at that school and my house is not super close. This is a principle that you are making the wrong choice here and it's clearly for a company's financial gain.

Catriona Gray

[redacted]

[redacted address]

[redacted]

Responder 483

Date: Fri, 27 Jun 2025 10:12:31 +0000

From: Geoff May

To: PlanningPolicy

Subject: Camden Local Plan - Proposed Submission Draft. Representation by Eton
Conservation Area Advisory Committee

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The Camden Local Plan Proposed Submission Draft April 2025 Representation by Eton Conservation Area Advisory Committee

Eton Conservation Advisory Committee submitted comments on the draft Camden Local Plan on 13 March 2024. We are pleased that all the comments which we made appear to have been fully considered, and in many cases our suggested amendments have been incorporated into the final 2025 Draft.

Our comments on the final submission Draft are as follows:

1. Central Camden site allocations C7, C8, C9 and C10 - tall buildings

These four sites make up the bulk of the proposed redevelopment of Camden Goods Yard. This redevelopment is already underway and planning permission has been granted for all but one of the sites. In our comments on the 2024 Draft Plan we expressed concern that the tall blocks currently under construction have a significant impact on views in and around adjacent conservation areas, on Primrose Hill open space, and have a harmful impact on the iconic and historic Roundhouse which is now lost in views from Haverstock Hill.

We asked that “Controls over the height of new development should be spelt out in the Development and Design Principles having regard to the impact of development on surrounding conservation areas and in particular the important local historic views from Haverstock Hill towards the Roundhouse, City of London and St Paul’s.”

In the revised 2025 Draft Plan Officers have acknowledged the point we made by including a reference which gives regard to the Vision and Objectives set out in the CGY Framework.’ ... *‘Heritage was a key consideration in identifying areas of search for tall buildings in Camden and formed part of the assessment criteria to guide decisions on the appropriateness of tall buildings within an area.’*

Regrettably the local historic views are already compromised by the tall blocks now built on the Morrisons Supermarket site (C7): we fear the same will be the case on the other three sites which is disappointing.

2. The incremental impact of loss or reduction of garden space, including paving over individual gardens and erection of “garden rooms”.

London is famous, and noted, for its landscape architecture both public and private. And in particular, its private rear gardens are unmatched for their prevalence and the contribution they make to its green spaces and biodiversity.

In light of this, in commenting on the 2024 draft, we suggested an amendment to Policy CC1 Responding to Climate Change to expressly avoid the incremental loss of private garden space through paving over and construction of garden rooms. Officers did not respond to this, but have picked up our concern by incorporating stronger language into The Natural Environment Policy NE1: Protection of Other Undeveloped Areas including Gardens - paragraphs 11.11,11.12 and 11.13.

Nevertheless, we wish to see a less equivocal statement of the importance of private gardens in paragraph 11.12. In the second sentence the third and fourth words “can be” should be replaced with “are”, so that it reads:

“Therefore, they **are** an important element of the character and identity of an area (its ‘sense of place’) and its biodiversity.”

3. Central Camden site allocation C27 – Land adjacent to Constable House, Adelaide Road

The Camden Local Plan Proposed Submission Draft introduces a new site allocation in Central Camden - C27 which was not in the 2024 version. It proposes that on land adjacent to Constable House, Adelaide Road Gypsy and Traveller accommodation should be provided in accordance with Policy H11 (Accommodation for Travellers). This site has historically been used as amenity space and playground associated with Constable House. As an amenity space and playground, it remains an important asset to Constable House residents and the wider community as well as the biodiversity of the area, supporting many mature trees and wildflowers.

This new site allocation is internally inconsistent with the general thrust of Policy SC4 B – Protection of Open Spaces. It is contrary to the following paragraphs under Policy NE1 The Natural Environment: A1 - protect and enhance the network of open spaces and local green spaces across the borough in accordance with Policy SC4 (Open Space); and A5 - protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible. In addition Policy NE1: Local Green Spaces – paragraph 11.10 states: “The Local Plan seeks to protect existing local green spaces, and the Council supports Neighbourhood Forums in identifying further local green spaces through neighbourhood plans. Inappropriate development of designated Local Green Spaces will not be supported except in the very special circumstances set out in national planning policy.”

This site allocation C27 should be deleted from the Camden Local Plan Proposed Submission Draft and designated as a local green space/open space and playground.

In summary, for the reasons described above we would like the following modifications to the Camden Local Plan Proposed Submission Draft:

- Policy NE1 The Natural Environment – Protection of other underdeveloped areas including gardens: paragraph 11.12

In the second sentence replace the third and fourth words “can be” with the single word “are”.

- Central Camden site allocation C27 - Land adjacent to Constable House, Adelaide Road

Delete Central Camden site allocation C27 and designate it as a local green space/open space and playground.

Date: Fri, 27 Jun 2025 10:12:28 +0000
From: Ray Bryant 1
To: PlanningPolicy
Subject: REPRESENTATION re. CAMDEN LOCAL PLAN (DRAFT)

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

I am against the inclusion of site C27 in the Camden Local Plan draft. The proposal to use this site is completely contrary to Policy A1 of the Camden Local Plan which places a high importance on protecting amenity. This proposal will, if implemented, would do the very opposite it will destroy a well-cared for local greenspace and children's play area.

This site is inappropriate for a traveller site for the reasons listed below:

- **Amenity Area for Constable House and Local residents:** The site is an 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
- **Existing Play Area:** The area was constructed as a play area for the residents of Constable House, and is used by local children as a playground and particularly serves as a play area for Constable House. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Important Green Space:** It is also an important Local Green Space /Open Space in a densely populated area with mature trees all, or most, of which are likely to be lost if the site is to be used as proposed
- **Local Community Involvement:** More recently the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. This is part of 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 new planting
- **Site access:** Access to the site for vehicles is limited and would involve creating a new access off Adelaide Road, a major through route for large vehicles into Camden, including a bus route. The alternative onto the narrow stretch of Eton Villas Road would cause loss of cycle and car parking.
- **Loss of open space:** Once trees are removed to create the space necessary for the proposed use. This would destroy the current open aspect of this corner so valued in a dense urban setting.
- **Privacy:** The site is overlooked on all sides by existing buildings. We understand that there will also be overlooked by the new building under construction on land adjacent to the Chalk Farm underground which will make the need for open space in this area even more important. Again, this is a key item in Policy A1 of the Local Plan which is being ignored with this proposal.

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.

I have only learnt of this proposal this week and there does not seem to have been a serious attempt at consultation with local residents in relation to the proposed use of this site. It seems that many residents, including of the Etons and Constable House, are still unaware of the proposals.

Is Camden Council adhering to the Gunning Principles for consultation? I only became aware of this consultation because local residents had put up notices. For such a significant change of use proposal, surely Camden Council should have provide better notification if they genuinely wanted to provide a fair and transparent process?

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

Ray Bryant



27 July 2025

For the attention of Camden Planning

OBJECTION TO CAMDEN LOCAL PLAN (DRAFT)

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

I am against the inclusion of site C27 in the Camden Local Plan draft. The proposal to use this site is completely contrary to Policy A1 of the Camden Local Plan which places a high importance on protecting amenity. This proposal will, if implemented, would do the very opposite it will destroy a well-cared for local greenspace and children's play area.

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- **Privacy** The site is overlooked on all sides by existing buildings. We understand that there will also be overlooked by the new building under construction on land adjacent to the Chalk Farm underground which will make the need for open space in this area even more important. Again, this is a key item in Policy A1 of the Local Plan which is being ignored with this proposal.

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.

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Is Camden Council adhering to the Gunning Principles for consultation? I only became aware of this consultation because local residents had put up notices. For such a significant change of use proposal, surely Camden Council should have provide better notification if they genuinely wanted to provide a fair and transparent process?

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

Ray Bryant



Responder 485

Date: Fri, 27 Jun 2025 10:17:12 +0000

From: Paul Aikkila

To: Daniel Pope, PlanningPolicy, [REDACTED]

Subject: Camden Local Plan 2025 - Local Community Response - Kentish Town

Dear Sirs and Madams,

Please find attached a collective response letter, on behalf the Local Community (as defined herein), on Camden's Draft Local Plan (2025).

A total of 366 residents, workers, students, parents of students, business owners and other stakeholders of Kentish Town have signed this letter.

Kindly note that certain signatories are also in copy of this email, however all signatures are provided on an individual basis unless otherwise indicated.

I also draw your attention to the data privacy notice (page 92).

Best regards,

Paul Aikkila

**KENTISH TOWN LOCAL COMMUNITY RESPONSE TO THE CONSULTATION
ON THE DRAFT LOCAL PLAN (2025) OF THE LONDON BOROUGH OF CAMDEN**

**OPPOSITION TO THE RELOCATION OF THE REGIS ROAD REUSE AND RECYCLING
CENTRE TO THE KENTISH TOWN POLICE STATION SITE**

By email delivery, 27 June 2025

To: London Borough of Camden

- Planning Policy Team
- Kentish Town South Ward Councillors Meric Apak, Joseph Ball and Jenny Headlam-Wells
- Mr David Burns, Director of Economy, Regeneration and Investment
- Councillor Nasrine Djemai, Cabinet Member for New Homes and Community Investment

Cc: Yoo Capital, Inkerman Area Residents Association, Kentish Town Neighbourhood Forum

(collectively, the **Recipients**)

**RE: OPPOSITION TO THE RELOCATION OF THE REGIS ROAD RECYCLING CENTRE TO THE
KENTISH TOWN POLICE STATION SITE**

Dear Sirs and Madams,

We, the undersigned, are residents, workers, business owners and other stakeholders of Kentish Town (together, the **Local Community**) and oppose the proposed re-provisioning of the Regis Road Reuse and Recycling Centre (the **Recycling Centre**) to the Kentish Town Police Station site.

STATED OBJECTIVES

In relation to the ongoing consultation on Camden's Draft Local Plan (2025) the Local Community respectfully petitions Camden Council and its Planning Policy team to:

1. prohibit any re-provisioning of the Recycling Centre within or near any of the Kentish Town Police Station, Holmes Road and York Mews sites (together, the **High Street Transition Area**) or any other site which would bring the Recycling Centre closer to the town centre area of Kentish Town Road,
2. restrict future development of the High Street Transition Area to low-rise residential, retail and office space,
3. continue working towards reducing vehicle-related nuisance in the Regis Road estate through a regenerated, green, pedestrian- and cycle-friendly Regis Road, in line with Camden's stated aspirations for the area,
4. involve the Local Community in future discussions related to the Recycling Centre, and
5. acknowledge receipt of this letter and confirm that Camden Council will formally consider it as part of the Draft Local Plan (2025) consultation.

RATIONALE

1. Proximity to our homes, schools and businesses

The Kentish Town Police Station site is surrounded by homes on Holmes Road, York Mews and the Inkerman Conservation Area, a quiet residential neighbourhood. It is also less than 200 meters from the town centre area of Kentish Town Road and its cafes and shops. Several schools and community assets are also located on Holmes Road. Relocating the Recycling Centre on the Police Station site would negatively impact the quality of life of local residents and the overall attractiveness of the area.

2. Health and environmental concerns

Relocating the Recycling Centre on the Kentish Town Police Station site would highly likely cause noise pollution, air pollution, heavy traffic disturbance as well as nuisance smells. These are serious risks to public health and safety in the area.

3. Damage to community character and value

Kentish Town has a strong local identity. Relocating a Recycling Centre into its heart would risk undermining Camden's own regeneration goals for the area, damaging its character and would highly likely negatively impact assets of the Local Community.

4. Lack of meaningful consultation

The information related to the proposed Police Station site as the location of a re-provisioned Recycling Centre was for the *first time* introduced in the final and "*adopted*" version of the Regis Road Area Guidance dated 10 March 2025. This information was not made public in any of the prior public consultations. This has denied the Local Community a fair opportunity to respond to this critical aspect of development plans for the neighbourhood.

WHY THIS MATTERS

Kentish Town is a vibrant, diverse community with a strong sense of identity. Re-provisioning the Recycling Centre in its heart would harm our town centre, our homes and possibly damage the local environment and put at risk the health and safety of residents and workers alike. The Local Community considers these risks to be material. We ask Camden Council to protect our neighbourhood and work with us to find a better, long-term solution in relation to the Recycling Centre for the benefit of all local stakeholders.

CONTACT DETAILS

The Council may respond by email to the Local Community through the following contact details:

Paul Aikkila (the **Organiser**)
Holmes Road Resident, London NW5 3AB
Email: [REDACTED]

SCHEDULES

- Schedule A – Recipients
- Schedule B – Relevant Background
- Schedule C – Public Consultation Feedback Summary pertaining to the Recycling Centre
- Schedule D – Map reference related to Camden's proposal related to the Recycling Centre (March 2025)

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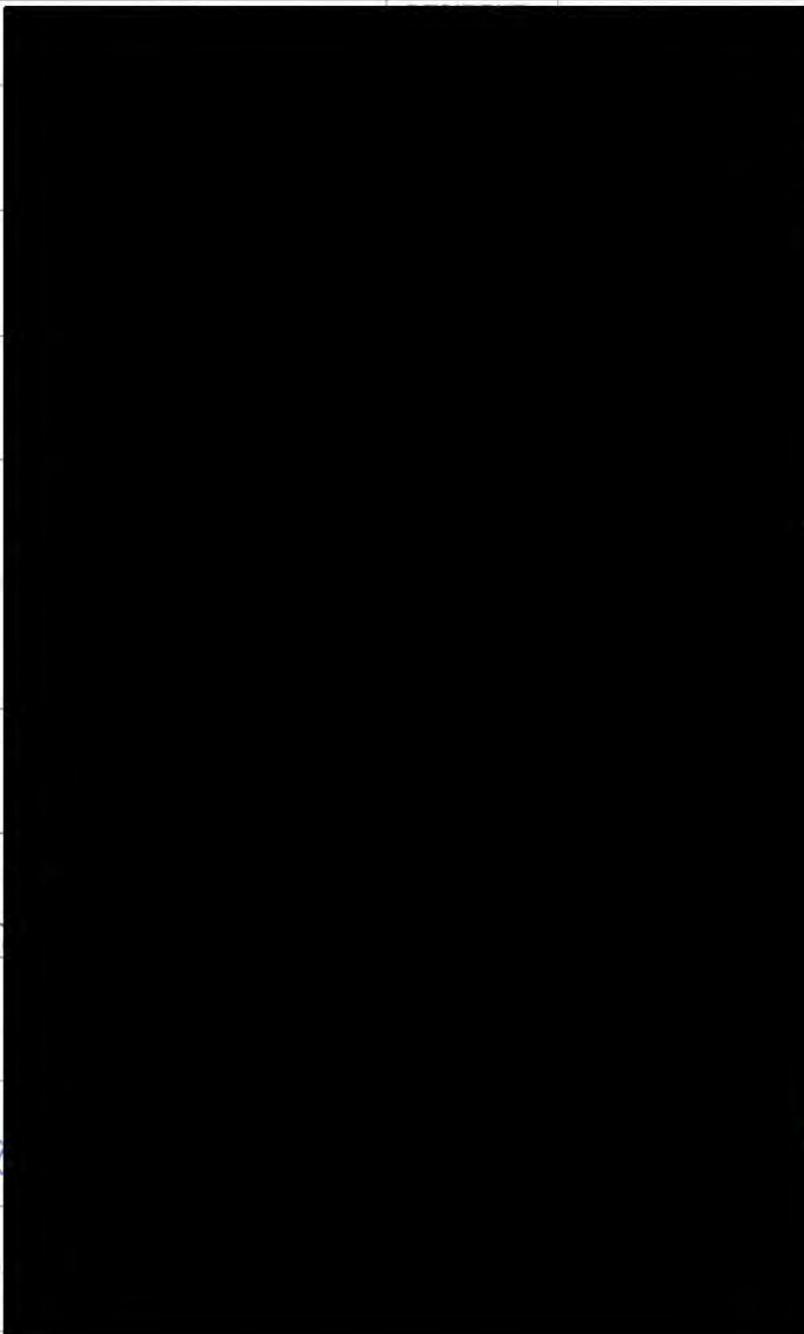
Each signatory hereto reserves its rights to provide Camden with any further feedback on the Draft Local Plan (2025) on an individual basis. Each signatory hereto consents to the Organiser providing the Recipients with the details laid out below.

| NAME | |
|-------------------|--|
| LAI YEE PAK | |
| Debby Hyams | |
| DAVID GEMO | |
| LUPA LEEB | |
| Claire Sandret | |
| PAUL HEIN | |
| CHEMIL LAMSON | |
| SWATSON | |
| L. STONE | |
| DAVE BERNARD | |

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| NAME | |
|--------------------------------|---|
| CHRIS HUDSON |  |
| Joanna Chow | |
| ROBERT LVOCK | |
| BRIGITTE ASCHER | |
| DEREK JARMAN | |
| IAN GRANT | |
| KENTISH TOWN NEIGHBOURHOOD FOR | |
| Inel Gams | |
| Nick Mejeude | |
| SAM ASHINE | |

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| NAME | |
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| LESLIE ANGEL | |
| CAROL EID | |
| Yunwen ZENG | |
| Amelia Saunders | |
| Mikael Rickros | |
| ALEX BILLINGTON | |
| THOMAS LEFERRE | |
| ZAHARIA FELKHOUS | |
| Perla Rumbazinski | |
| Alexander Blake-Pink | |

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| NAME | |
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| Julia FABRICIUS | |
| James HEMSLEY | |
| ALEX GATT | |
| CAPT. JOHN WIXON | |
| KARIM NASR | |
| Freddie Richardson | |
| Emmanuel VIVANT | |
| ANDRÁS KOSZMICEK | |
| Carys Lear | |
| Jasmine Anderson | |

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| NAME | |
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| Valentina Mazzoni | |
| Nicolas Chewitchovic | |
| See edwards | |
| Rebecca Trever | |
| Helena Trever | |
| A. Edwards | |
| Mallory Timmermans | |
| Matthew Miles | |
| Dinah Caine | |
| Roy Lockett | |

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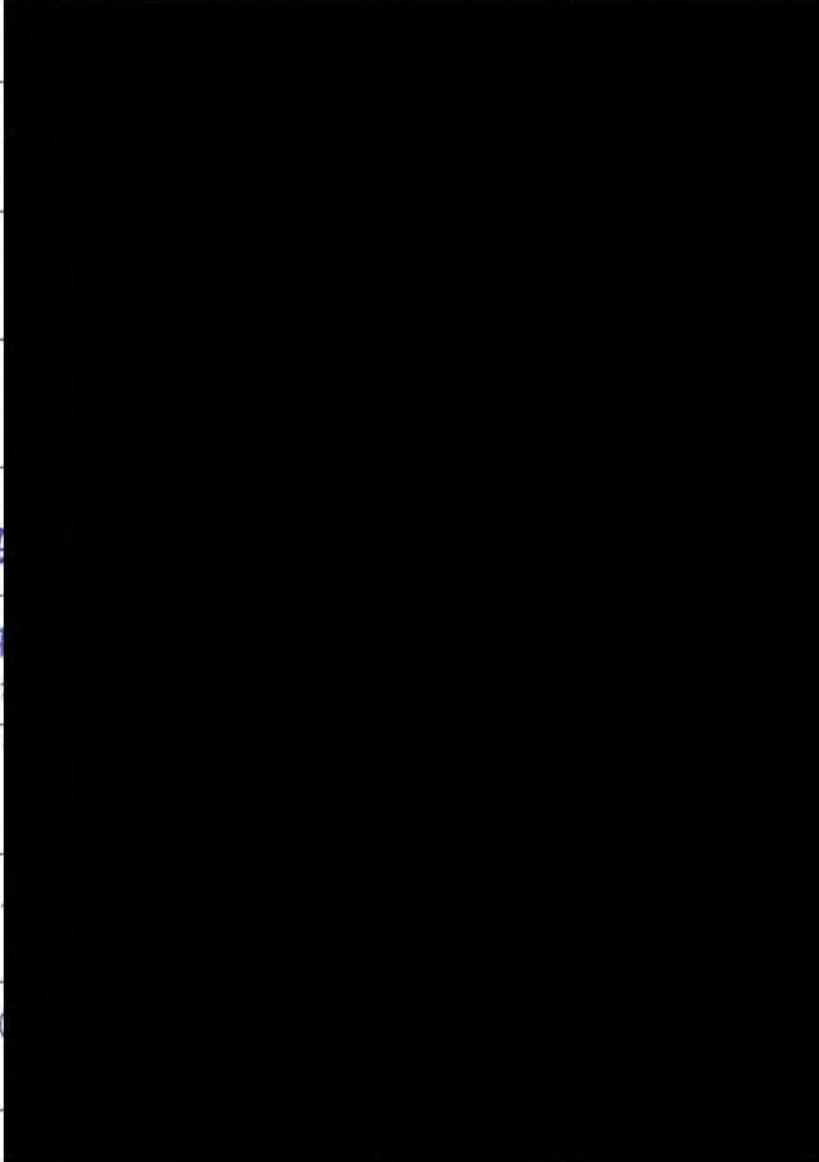
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| NAME | |
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| PETER LAPTHORP | |
| Kim Sudra | |
| Ambrose Seinsbury | |
| KATE GOLDEN | |
| FEDERICA DIAGIOTTI | |
| James Linschaf | |
| Tosco Stefanidis | |
| Alexa Segal | |
| Jeremy Bradshaw | |
| Rosie Gadh | |

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| NAME |  | | |
|-------------------|---|--|--|
| C. TOWNSEND | | | |
| M. Maria | | | |
| L Rawley | | | |
| S. GILLESPIE | | | |
| M. VILLAGRA | | | |
| D. Ayame | | | |
| Gerald Hawking | | | |
| Joyce Hawking | | | |
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| NAME | |
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| DAVID KERR | |
| Lorcan Kerr | |
| Shahid Rahman | |
| Koliur Rahman | |
| Ritzy Stewart | |
| Nicola | |
| Kate + Juliana | |
| JULIAN VIZ AND | |
| Brigitte McConnell | |
| DANIEL Thomas | |

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| NAME | |
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| Dina Napapetyants | |
| Judith Leet | |
| Serge Minsionui | |
| SIMON ROOST | |
| Susann Diederich- in-Ara | |
| Rya Markit | |
| Alex Laing | |
| John Smith | |
| → Verna Urig | |
| Ben Wright | |

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| NAME | RESIDENT / |
|------------------------|------------|
| MISS DONNA MOUNTAIN | [REDACTED] |
| E. ANNE BOSTON | [REDACTED] |
| Tim Spence | [REDACTED] |
| LEOPOLDO DA MATA | [REDACTED] |
| William Pelton | [REDACTED] |
| Nakasha Wierre-Gore | [REDACTED] |
| PETER RAMSAY | [REDACTED] |
| Gemma Ramsay | [REDACTED] |
| XANDER COY | [REDACTED] |
| ALEXANDRA RILEY | [REDACTED] |

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| NAME | RECIPIENT |
|---------------------------|------------|
| COLIN BARR | [REDACTED] |
| WENDY MCKAIG | [REDACTED] |
| Stevie Barr | [REDACTED] |
| ALEX BOX | [REDACTED] |
| HAKAN AGCA | [REDACTED] |
| MARINE AGCA- | [REDACTED] |
| VIVIANE RAMOS | [REDACTED] |
| PAULO RAMOS | [REDACTED] |
| Matthew Siching-Vaultt | [REDACTED] |
| Ruby McCallough | [REDACTED] |

v

Jan

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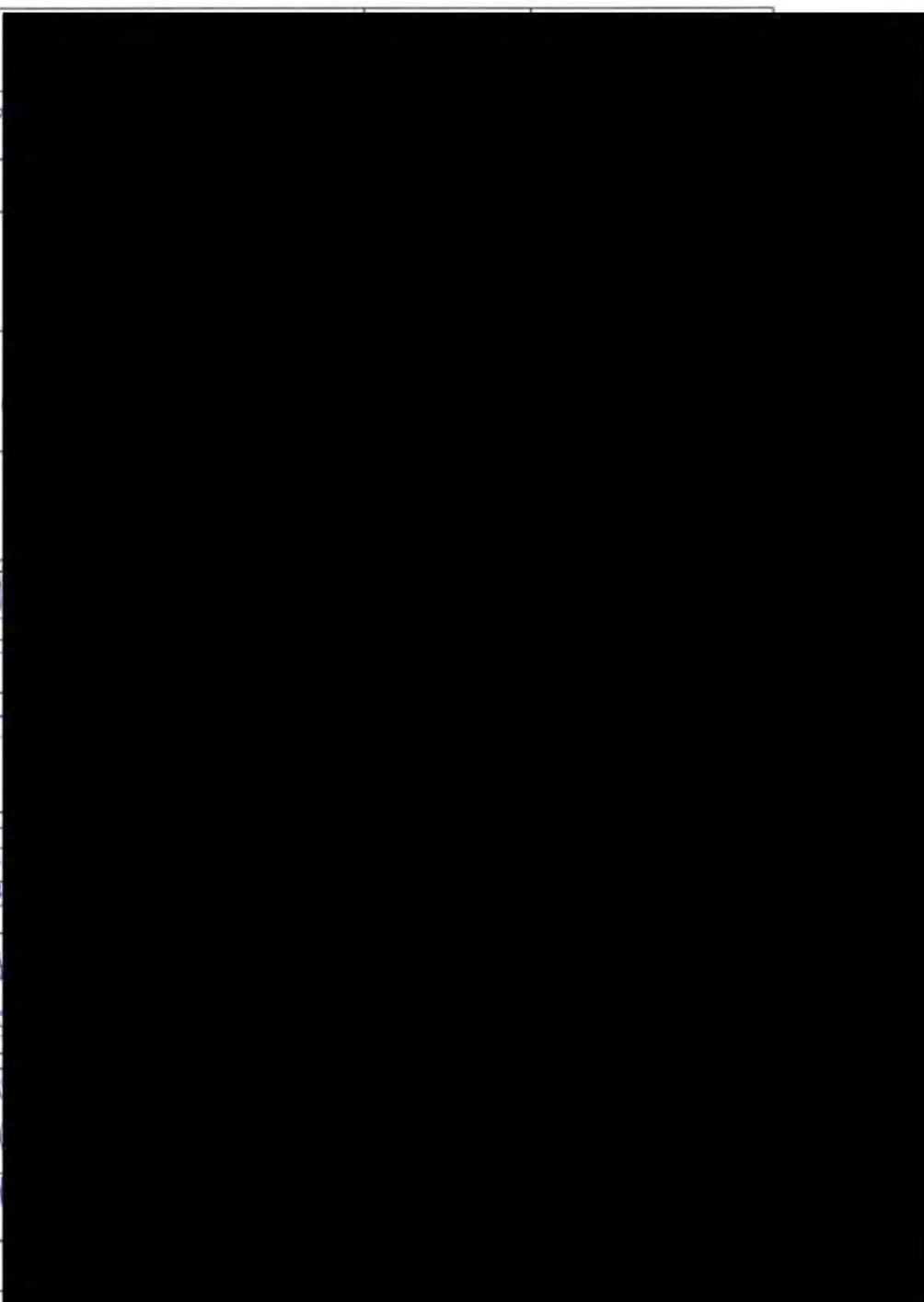
| NAME | |
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| Snow Carney | |
| JANE KINDLE | |
| JAMES DARSONS | |
| Debbie Carney | |
| ANELIE PERRAZ | |
| ADAM HABIDI | |
| GEORGE LIVERAS | |
| Michael khu | |
| Mary Hill | |
| Hamet Caven | |

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| NAME |
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| JON SPITERI |
| ANDREW DARWIN |
| PAUL PERIN |
| SUSAN McNeill |
| Sara Taylor |
| Bénédicte WAGNER |
| Justine Roberts |
| Olivier Blin |
| Ian Perrin |



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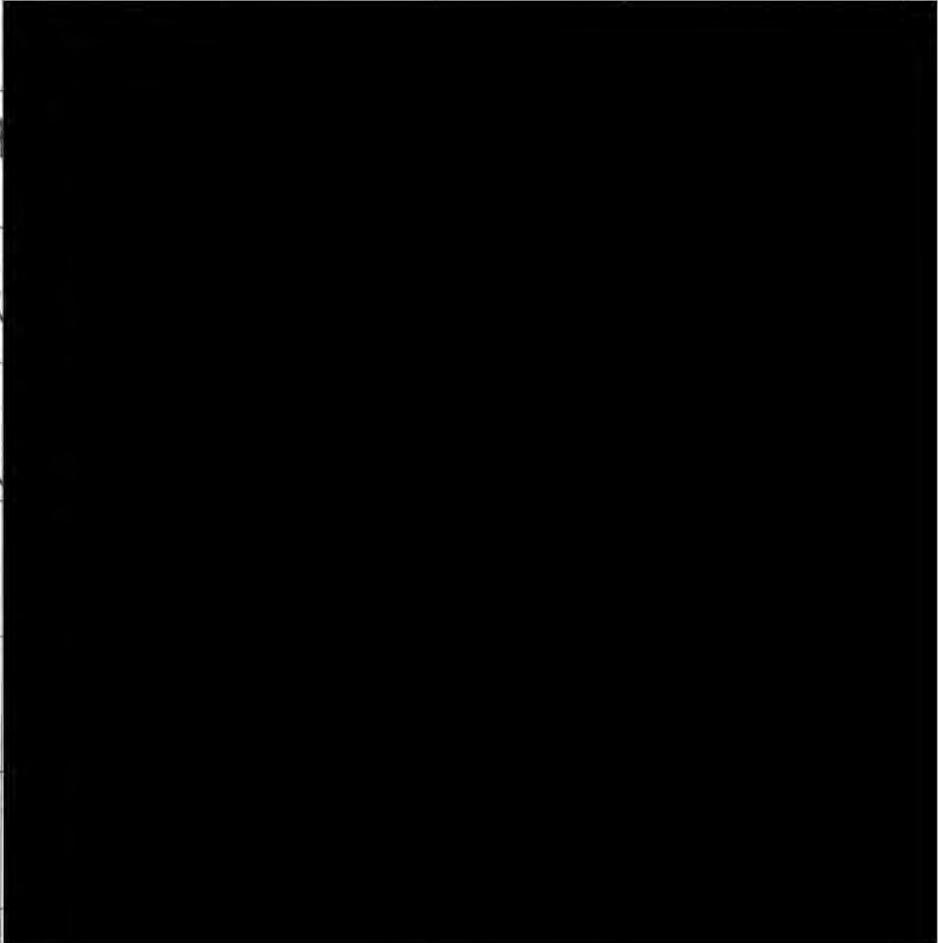
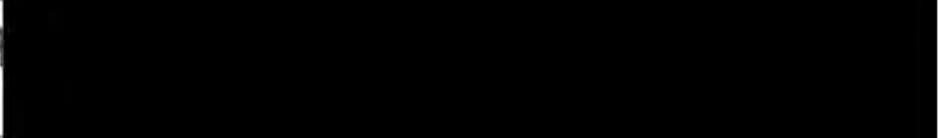
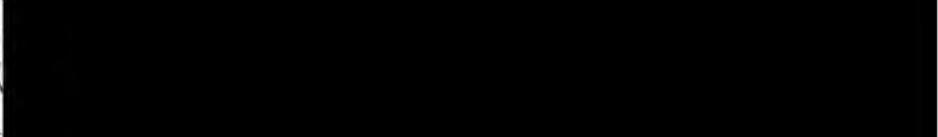
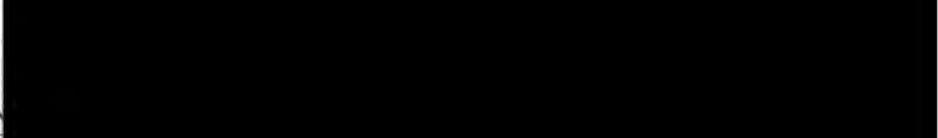
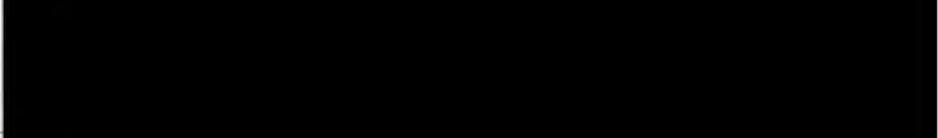
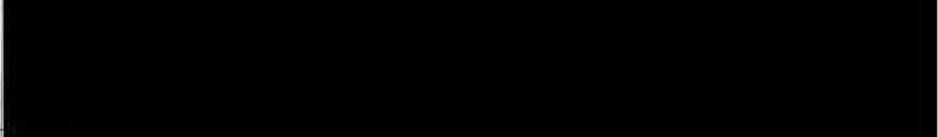
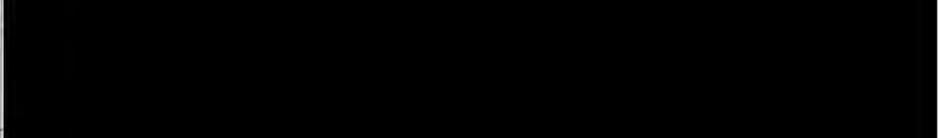
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| NAME | |
|---------------------|--|
| Yakona Faddoul | |
| Lawrence BIRAGNET | |
| Rick SALEY | |
| Adil KHAN | |
| Isabelle KILLICK | |
| Eglantine Duche | |
| Maria-Krystina DUAL | |
| Domitille FARABET | |
| Benoit Antille | |
| FORWARD CELINE | |

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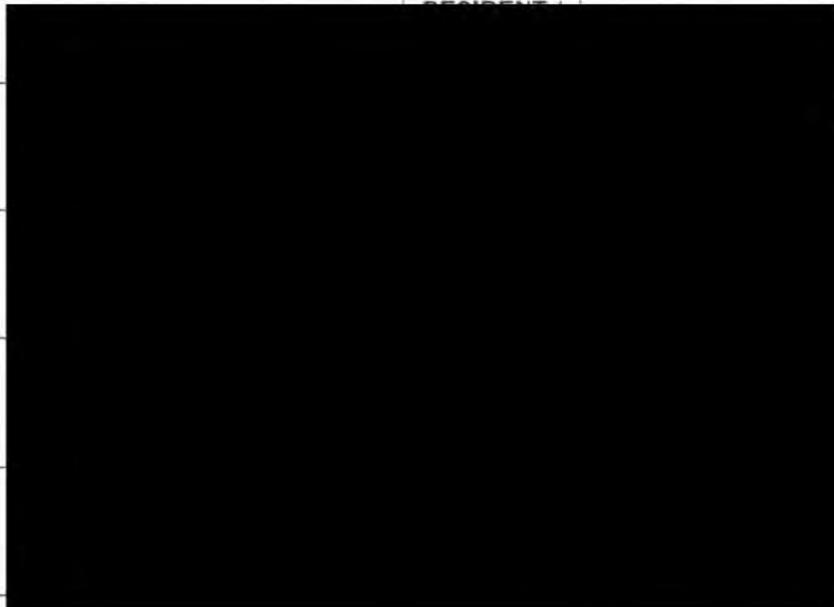
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| NAME |  | | |
|-----------------|--|--|--|
| SHAD ACHYU P |  | | |
| Rima Kalsi |  | | |
| Anna Nusteraa |  | | |
| Tiajie Hu |  | | |
| Men Huang |  | | |
| Ribala Haidar |  | | |
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| NAME | RESIDENTIAL | | |
|------------------|---|--|--|
| Pearl Ashkita |  | | |
| Tola Adesoji | | | |
| Sally Whittle | | | |
| MARC PHICUS | | | |
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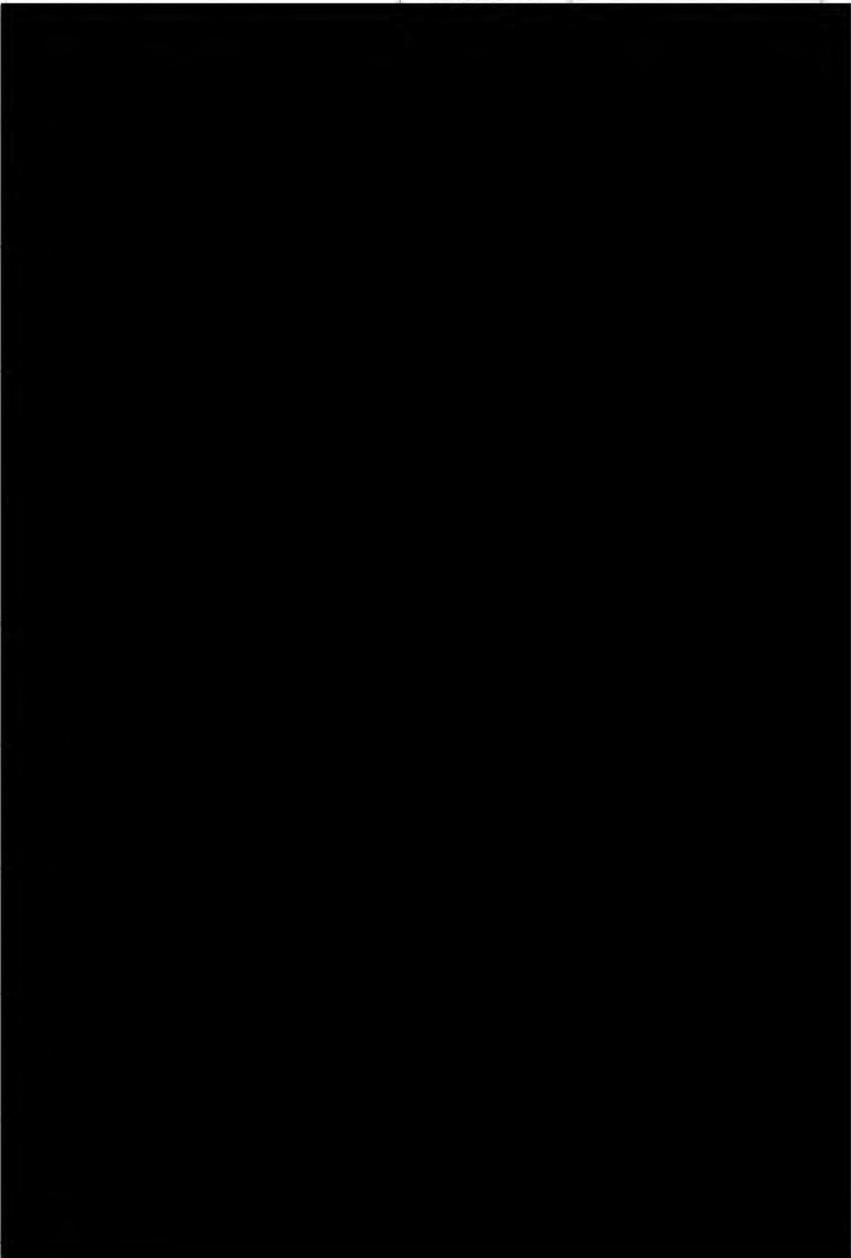
| NAME | |
|-----------------|--|
| Julian Drake | |
| Lucas Fellner | |
| Seb Hale | |
| David Katz | |
| Samuel Sullivan | |
| Dario Herrera | |
| Chloe Bennett | |
| aka Maya Gold | |
| Jasper Hill | |
| Maya Hamilton | |

Water

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| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE |
|-----------------------------|---|-----------------------------------|-----------|
| Alicia Sharp |  | | |
| Ethan Connolly | | | |
| Tom Smith | | | |
| Lucy Weach | | | |
| Leo Leo Elias | | | |
| Robby Elias | | | |
| Jack Green | | | |
| Sammy Connolly | | | |
| miles HARRINGTON | | | |
| Thomas Whitaker | | | |

Water

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| NAME | |
|---------------------------|--|
| JASON BLAYNE | |
| LOU-Ann PARHEU | |
| Erica Malyponia | |
| KASHMA RACHURA | |
| LISA HALLIDAY | |
| Dani Rahumzadeh | |
| Shamil Rizvi | |
| Tera Miller | |
| Malgonzata Kuczyńska | |
| Nirmal Singh Lakhanpal | |

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| NAME | [Redacted] | | |
|-----------------|------------|--|--|
| James Miller | [Redacted] | | |
| David Brown | [Redacted] | | |
| Mathew Anderson | [Redacted] | | |
| Laura Thomas | [Redacted] | | |
| Cindy Johnson | [Redacted] | | |
| Lukas Cokens | [Redacted] | | |
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| NAME | |
|-----------------------|--|
| KARA DAVIS | |
| NEDA JAITKEVICIUTE | |
| Erin Goldman | |
| Jing Li | |
| ROBERTA CAMO | |
| Ella Frydherbe | |
| CLARE ORDER | |
| Nikola Przyplata | |
| Sydney Newton | |
| KATIZIA CAMO | |

worley

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| NAME | |
|----------------------|--|
| MR ATILLA | |
| MRS PAKIZE | |
| Mr Fernandez | |
| Ms Collet | |
| Chaudhary Khushi | |
| M. M. M. M. | |
| ULLYSSES PATTICHI | |
| Dance Baladeo | |
| ENNIO LONN | |
| Madellet Seyoum | |

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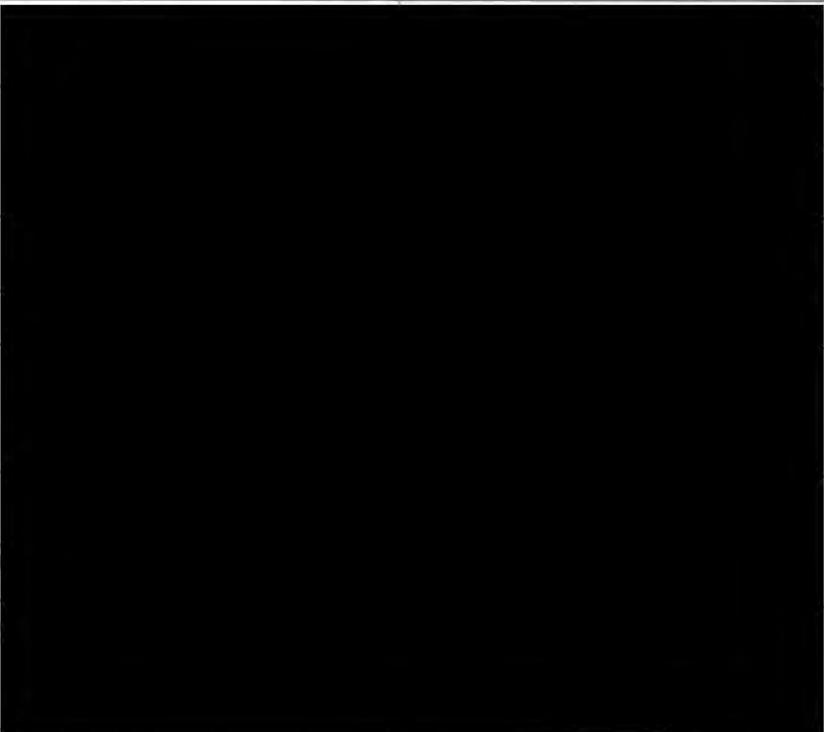
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| NAME | |
|------------------|--|
| Jane Carroll | |
| Amira Khalid | |
| Mabel Cardozo | |
| Abdul Sanad | |
| JONATHAN KENNEDY | |
| Keira Pearson | |
| Ricki Sky | |
| Simon Bayne | |
| Sophie Cohen | |
| Akiva Elias | |

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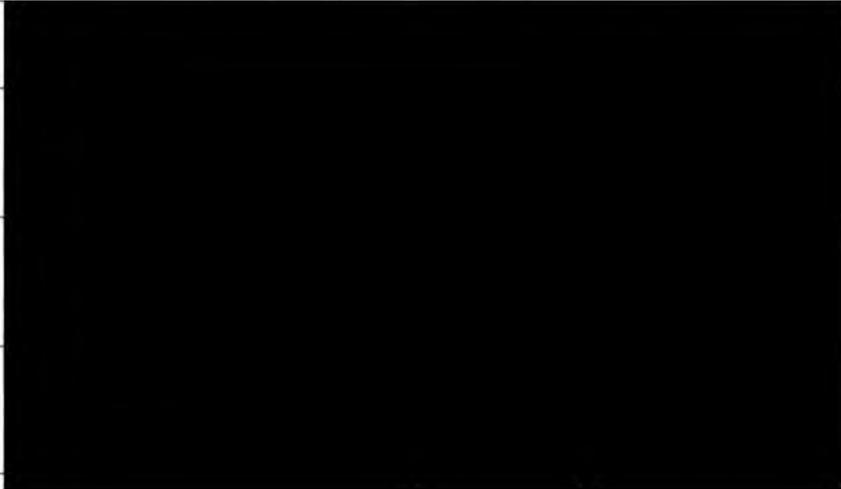
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| NAME |  | | |
|-------------------------|---|--|--|
| MEENA TILLMAN | | | |
| AMY LOBUE | | | |
| BRGDAN ANGHEL | | | |
| ELIA BOZZOLI | | | |
| PANCHASHILA GUBRZONI | | | |
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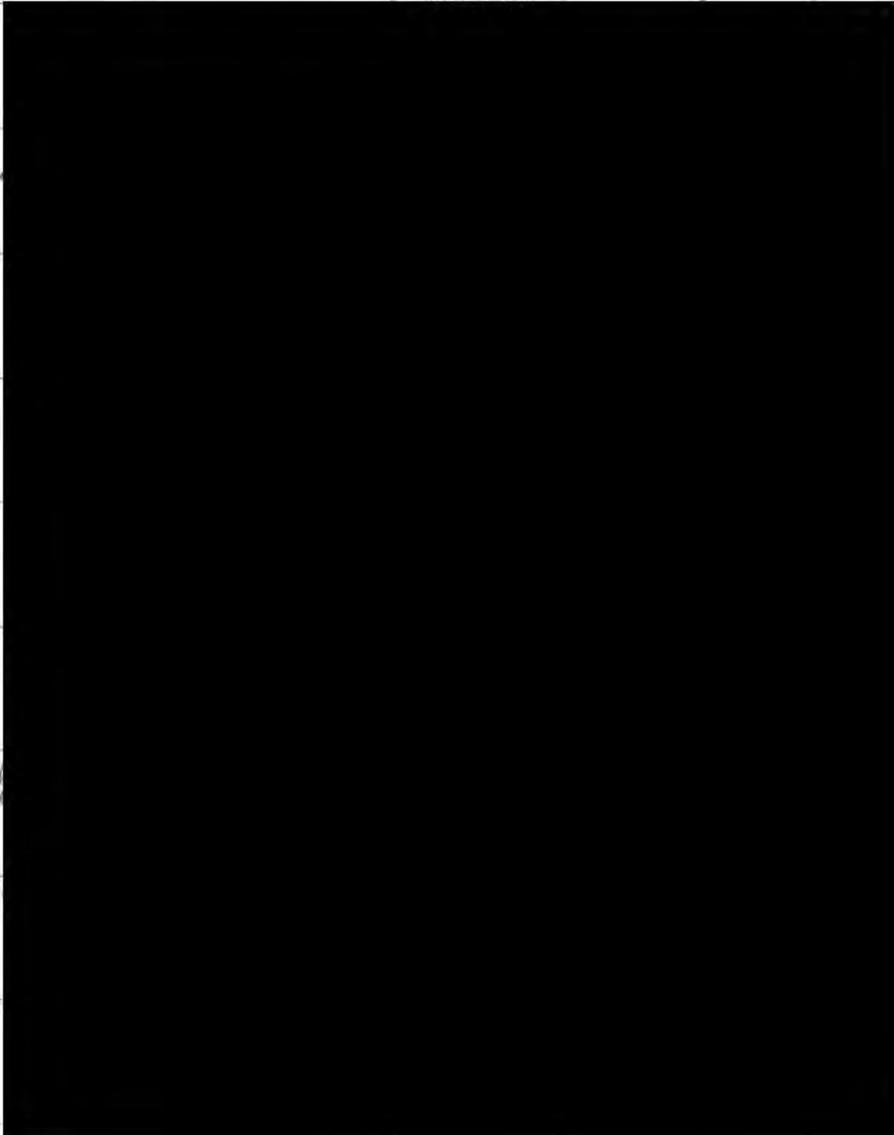
| NAME |  | | | | | | | | |
|-------------------------------------|--|--|--|--|--|--|--|--|--|
| Signature NURUL AHMED | | | | | | | | | |
| Marica eloldowany | | | | | | | | | |
| Kazi Islam | | | | | | | | | |
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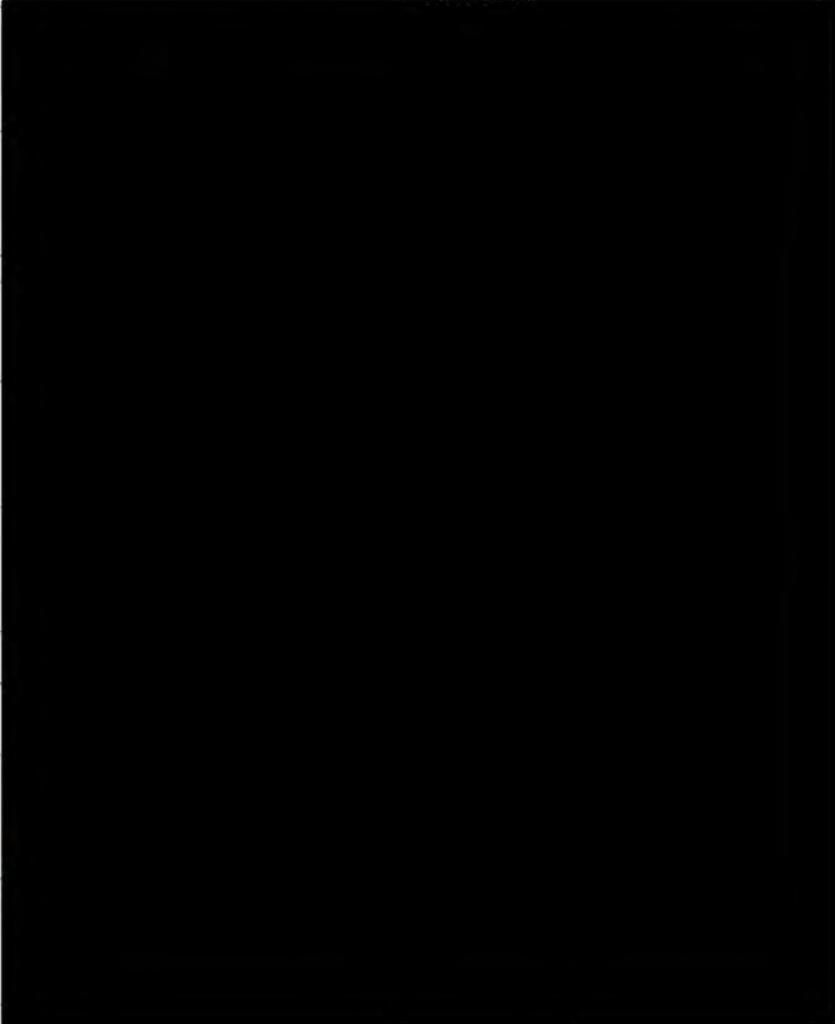
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| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE |
|----------------------|---|-----------------------------------|-----------|
| COWINS |  | | |
| PAUL SMITH | | | |
| Joe Graber | | | |
| Matthew Parkinson | | | |
| PHILIP HAMILTON | | | |
| ETHAN AARON BANKS | | | |
| Dante Douglas | | | |
| Lily Wakeling | | | |
| Antonio Lopes | | | |
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|---------------------|---|-----------------------------------|-----------|
| Lily Pearce |  | | |
| Ameir Saeed | | | |
| Deep Kumar Patel | | | |
| NOMAN MURTAZA | | | |
| GOURI GOPAN | | | |
| Latisha Patel | | | |
| LOUA LEWANDOWSKA | | | |
| SAMIR MAHIL | | | |
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|---------------------|---------|-----------------------------------|-----------|
| Alexandra Paton | | | |
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| Celine Denoiseux | | | |
| GASSIAN David | | | |
| Eldie Schwob | | | |
| Julie Louvrier | | | |
| Laurence Ladecky | | | |
| Laurent BARTHIER | | | |
| Marjorie Lacassagne | | | |

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|----------------------|------------|-----------------------------------|-----------|
| KELLY TODD | [REDACTED] | | |
| FRANCOIS LE PALEC | | | |
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|-----------------|---------|-----------------------------------|-----------|
| Pierre Negre | | | |
| Olivia Lanctuit | | | |
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| Edwige Roussel Vona | | |  |
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|---------------------|------------|-----------------------------------|-----------|
| AKANCHSHA SINGH | [REDACTED] | | |
| GUILLAUME ADNOT. | | | |
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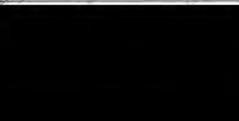
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| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE |
|-----------------------|------------|-----------------------------------|-----------|
| CAMILLE BEAUVAIS | [REDACTED] | | |
| Alexandre Beauvais | | | |
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|-----------------|--|-----------------------------------|---|
| Edouard Asselin |  | |  |
| Veronica Nosedá | | |  |
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|--------------------------|---------|-----------------------------------|-----------|
| Thierry Delalande | | | |
| Karina Castaneda Diaz | | | |
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| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE | | | |
|-------------------|--|-----------------------------------|-----------|--|--|--|
| ERIC DELOMIER |  | | | | | |
| CATHERINE TSAO | | | | | | |
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| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE |
|----------------|---------|-----------------------------------|-----------|
| Anne Gravier | | | |
| Arnaud Gravier | | | |
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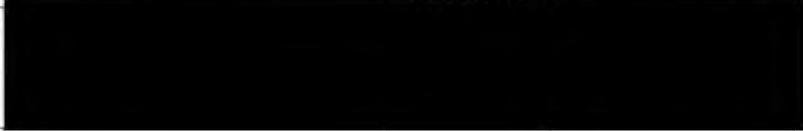
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| Thomas Girod |  | | |
| Helen Burrows | | | |
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| Florentine Dusannier |  | | |
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| Yijing Zhang |  | |  |
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|-----------------|--|-----------------------------------|--|
| Christine Moran |  | |  |
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|-------------|--|-----------------------------------|-----------|
| Aude Brunel |  | | |
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|----------------------------|--|-----------------------------------|-----------|
| <i>Jonathan Fitzgerald</i> |  | | |
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| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE |
|------------------|--|-----------------------------------|-----------|
| Celine LLANTA |  | | |
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|----------------|---------|-----------------------------------|-----------|
| Mauricio Karam | | | |
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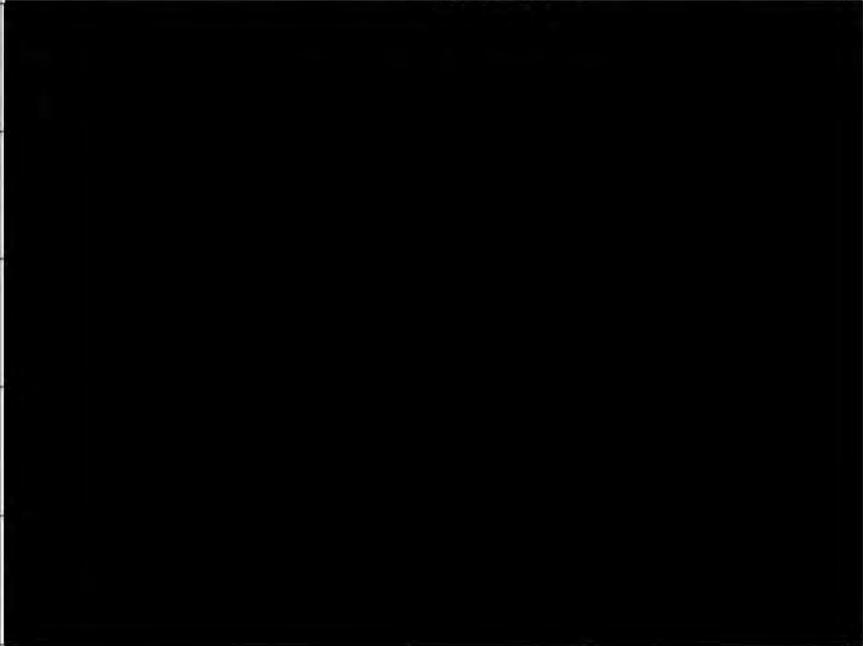
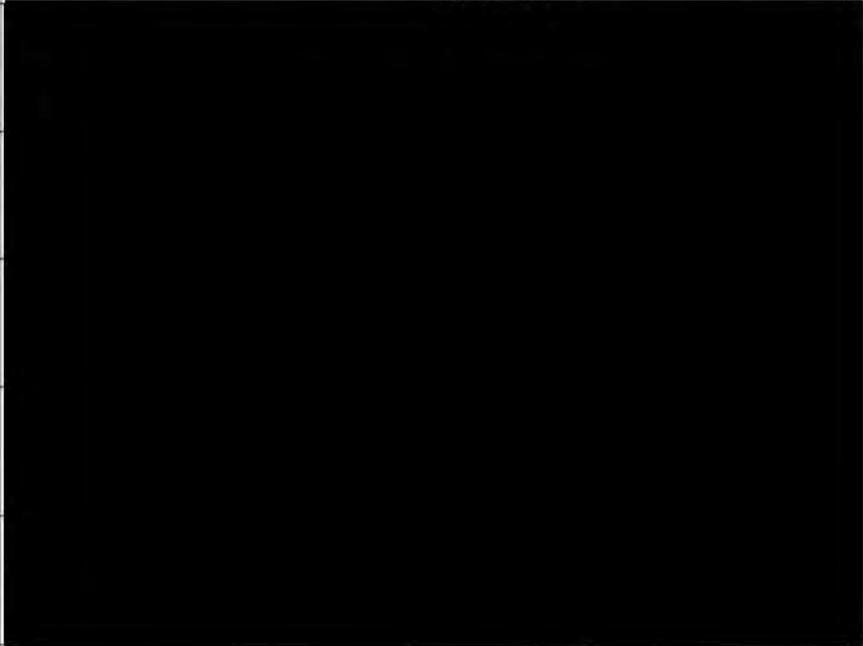
| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE |
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| KECHI HOLLOWAY |  | | |
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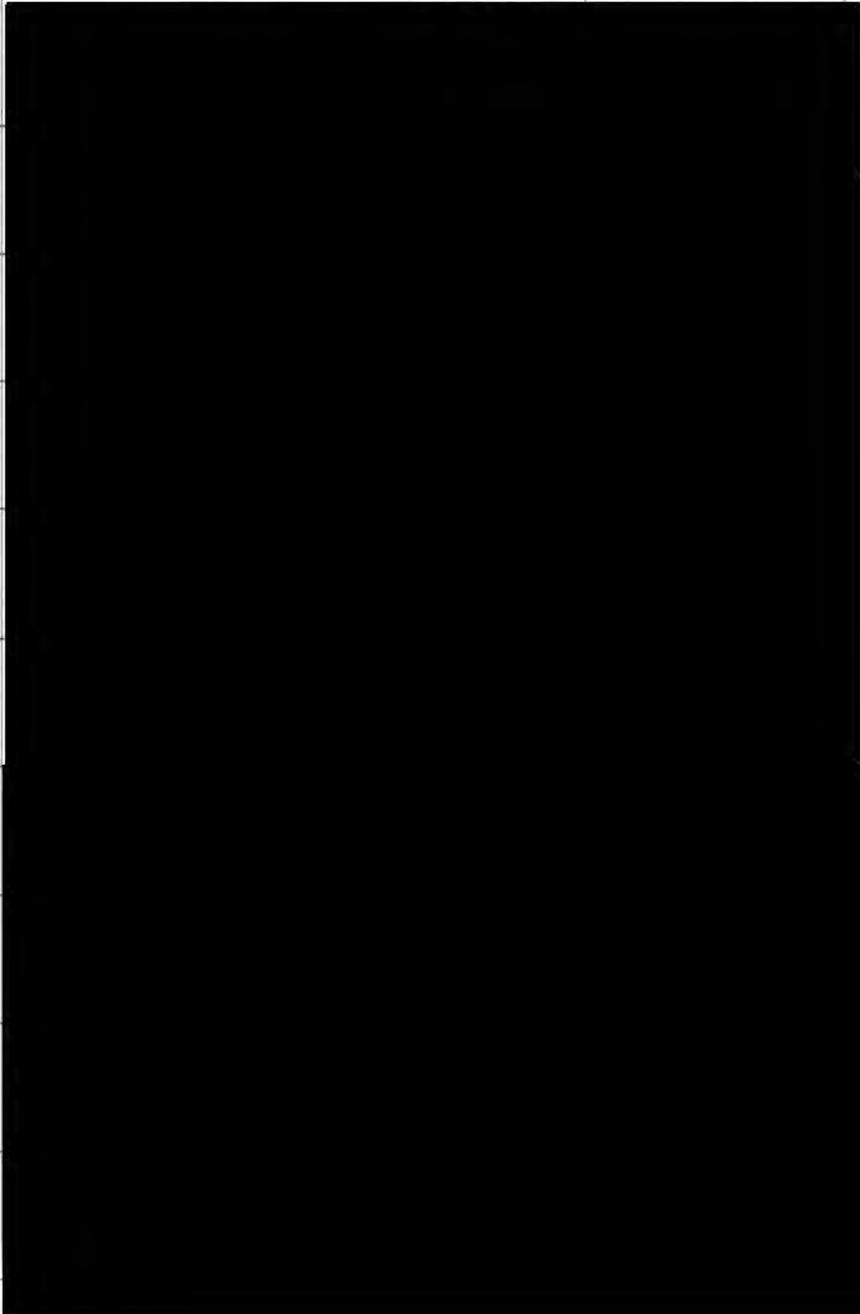
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|------------------------|---|-----------------------------------|---|
| Angelica Pina Lebre |  | |  |
| Fatou Zhalou | | | |
| Edem Tsetay | | | |
| Semu | | | |
| Hanan | | | |
| Carla W | | | |
| R HERNAN | | | |
| G REED | | | |
| V REED | | | |

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|-------------------------|---|-----------------------------------|-----------|
| FRANCOIS RIVOIRE |  | | |
| Benjamin Bejrek | | | |
| Peggy NIHO | | | |
| Nane-Asathe BEUSCHET | | | |
| Nicolas Maabouf | | | |
| EMMANUEL GUILLO | | | |
| Aucore Braconnier | | | |
| JACQUES Guillemain | | | |
| David Shulman | | | |
| Fredrika Olausson | | | |

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|------------------------|---------|-----------------------------------|-----------|
| Sébastien Dormeiel | | | |
| Marie Dormeiel | | | |
| Sam McCarthy | | | |
| Javier Mason | | | |
| Harmony Fitzgerald | | | |
| Kosha Schuler | | | |
| Waima Abed | | | |
| SERVENS Rayhai | | | |
| NARTIQ Itadese | | | |
| CAROLINE MACPHERSON | | | |

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|-------------------------|---------|-----------------------------------|-----------|
| Wendy Rowett | | | |
| Carla Contreras | | | |
| T. Lautenberg | | | |
| D A Nguen K Lazarova | | | |
| LISA CUREAN | | | |
| Caroline Selby | | | |
| Charlotte Depauls | | | |
| PAULA COUPTOIS | | | |
| LAIN BALD | | | |

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|---------------------------|---------|-----------------------------------|-----------|
| Gwendoline Ferté | | | |
| ALEXIS WAO | | | |
| Julien SPIEGEL | | | |
| Crystelle Le Labourier | | | |
| Leslie fourmer | | | |
| Matthieu Toulet | | | |
| CARLOS CLIMENT | | | |
| Katell MORVAN | | | |
| Emmanuelle Alay | | | |
| Sébastien PASCAL | | | |

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|----------------------|------------|-----------------------------------|-----------|
| MARCO BERGAMO | [REDACTED] | | |
| MARIANNE LASSERRE | | | |
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| Caroline Clement | [REDACTED] | | |
| Bruno CLEMENT | | | |
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| Ekaterina LEHAIR | | | |
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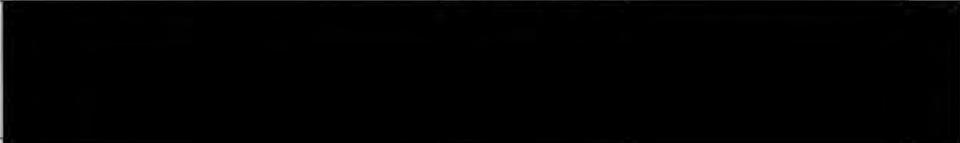
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| Florian G fourn | | | |
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| Maria ROSEMIN |  | | |
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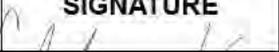
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| Wendy MARTINSSON | [REDACTED] | | |
| AUF MARTINSSON | | | |
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| Christopher Khouri | [REDACTED] | |  |
| Alexandra B Khouri | | | |
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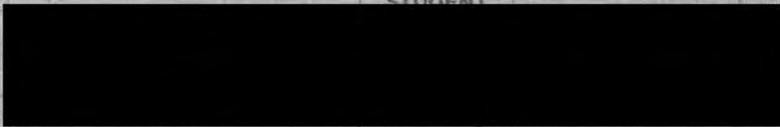
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| Clement Farabet | | | |
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| Liliya Dorozhovets |  | |  |
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| Huda Al-Hadithy |  | | |
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| Irina Zavyalova | | | |
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| Aurelie MARAIS | | | |
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| Eleonore McCandless | | | |
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| Helen Cockcroft | | | |
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| Blandine Decaillet | | | |
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| Aurèlie Benais | | | |
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| Louise Evans | | | |
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| Coline COURTIAL | | | |
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| HAMEL Baptiste |  | | |
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|------------------|---|-----------------------------------|-----------|
| Gregory Sidier |  | | |
| Hanna Assayag | | | |
| Charlotte Sidier | | | |
| Raphael Sidier | | | |
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|---------------------|------------|-----------------------------------|-----------|
| HUBBARD Caroline | [REDACTED] | | |
| CLAVEAU Aimee | | | |
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| JP Doumeng | [REDACTED] | | |
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| Gustav Ando | | |  |
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| Henry Barrow | | | |
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| Carlos Moran | | | |
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|------------------|---------|-----------------------------------|-----------|
| Veronique Bofane | | | |
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SIGNATURE PAGE

**KENTISH TOWN LOCAL COMMUNITY RESPONSE TO THE CONSULTATION
ON THE DRAFT LOCAL PLAN (2025) OF THE LONDON BOROUGH OF CAMDEN**

Each signatory hereto reserves its rights to provide Camden with any further feedback on the Draft Local Plan (2025) on an individual basis. Each signatory hereto consents to the Organiser providing the Recipients with the details laid out below.

| NAME | ADDRESS | RESIDENT / WORKER / STUDENT | SIGNATURE |
|----------------|---------|-----------------------------------|-----------|
| Amade Cohen | | | |
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SCHEDULE A – RECIPIENTS

To:

London Borough of Camden, Camden Council

5 Pancras Square, c/o Town Hall, Judd Street, London, WC1H 9JE

For the attention of:

1) *Planning Policy Team*

- Mr Daniel Pope, Chief Planning Officer [REDACTED]
- Planning Policy Team (planningpolicy@camden.gov.uk)

2) *Kentish Town South Ward Councillors*

- Councillor Meric Apak [REDACTED]
- Councillor Joseph Ball [REDACTED]
- Councillor Jenny Headlam-Wells ([REDACTED])

3) *Mr David Burns*, Director of Economy, Regeneration and Investment

[REDACTED]

4) *Councillor Nasrine Djemai*, Cabinet Member for New Homes and Community Investment

[REDACTED]

For information (cc):

Yoo Capital

2 Bentinck Street, London W1U 2FA

Attn:

- Mr Simon Lear, Managing Director Camden Film Quarter ([REDACTED])
- Mr Lloyd Lee, Co-Founder, Managing Partner & Chair Investment Committee ([REDACTED])
- Mr Dominic Holmes, Principal ([REDACTED])

Kentish Town Neighbourhood Forum

c/o Kentish Town Community Centre, 17 Busby Place, London NW5 2SP

Attn:

- Mr Ian Grant, Chairman ([k](#) [REDACTED])
- Distribution List ([REDACTED])

Inkerman Area Residents Association Ltd [REDACTED]

SCHEDULE B – BACKGROUND INFORMATION

1. The Regis Road Area has been identified as an area for growth in Camden’s Local Plan (2017) and an opportunity for comprehensive redevelopment. In July 2020, the Kentish Town Planning Framework (**KTPF**) was adopted by Camden Council as a Supplementary Planning Document setting out a vision and strategy to guide future development. Further, in 2020 Camden Council adopted a Regeneration Strategy to bring forward regeneration projects using its land assets on Holmes Road and Regis Road.
2. As an outcome of this Regeneration Strategy, Camden Council approved in March 2023 the conditional sale to Yoo Capital of certain of its land including, amongst other, that of the Recycling Centre and the Holmes Road Depot. This transaction was reliant on the acceptable re-provisioning of, amongst other, the Recycling Centre.
3. In November 2024, Camden published the Regis Road Area Guidance, Addendum to Kentish Town Planning Framework (the **Draft Regis Road Area Guidance**). Camden prepared this document to add detail to the objectives and principles of the KTPF and reflect changing circumstances since 2020. Amongst other, the Draft Regis Road Area Guidance:
 - a. clarifies that the site of the Kentish Town Police Station located on Holmes Road and the High Street Transition Area has become part of the Regis Road masterplan area,
 - b. identifies the High Street Transition Area as a future “*urban fabric that supports active uses and safe and pleasant pedestrian uses*” with “*public realm design*” which should “*enable active uses to spill out positively*” and further states that “*uses should include retail and workspace as well as civic uses and residential*”,
 - c. does not provide information in relation to the contemplated future location of a re-provisioned Recycling Centre.
4. The Draft Regis Road Area Guidance is the basis on which Camden conducted a public consultation between 12 November 2024 and 23 December 2024 (the **Public Consultation**). In February 2025, Camden Council published a summary of the feedback received during the Public Consultation (the **Public Consultation Feedback Summary**). The Public Consultation Feedback Summary, amongst other:
 - a. states that “*many requested that the recycling centre is retained*” and “*requests were made for the location of the recycling centre to be shown on plans*”
 - b. provides statistics regarding responses given to specific questions addressed as part of the Public Consultation.
5. On 10 March 2025, Camden Council published a new revised and adopted version of the Regis Road Area Guidance as a Supplementary Planning Document, serving as an addendum to the KTPF (the **Adopted Regis Road Area Guidance**). The Adopted Regis Road Area Guidance included for the first time information clarifying the proposed location of the re-provisioned Recycling Centre to be the “Police Station site”, which is located in the High Street Transition Area (see Schedule D).
6. Camden Council published a draft Local Plan for consultation on 1 May 2025 (the **Draft Local Plan**). The section “Policy Allocation C4 – Kentish Town Police Station” of the Draft Local Plan does not make reference to a re-provisioning of the Recycling Centre on the Kentish Town Police Station site. However, it is stated in the same section that “*the Council would support the site being taken forward as part of the development of Regis Road (Policy C3’)*” which by extension may open the possibility for the Recycling Centre to be re-provisioned on the Kentish Town Police Station site under the Draft Local Plan, in line with the Adopted Regis Road Area Guidance.

Source: London Borough of Camden

¹ It is understood that the Draft Local Plan meant to refer to “Policy C2” which corresponds to Regis Road, as opposed to “Policy C3” which corresponds to the Murphy site.

**SCHEDULE C – PUBLIC CONSULTATION FEEDBACK SUMMARY PERTAINING TO THE
RECYCLING CENTRE**

| Page Ref. | Question | Responses |
|------------------|--|--|
| 20 | <ul style="list-style-type: none"> Are there any other recent changes or developments in the Regis Road Area that we should consider? | <ul style="list-style-type: none"> 6 responses referred to the “retention of a recycling centre” |
| 24 | <ul style="list-style-type: none"> Do you have any further comments on the spatial strategy for the Regis Road Area? | <ul style="list-style-type: none"> 1 single response refers to the retention of the recycling centre |
| 34 | <ul style="list-style-type: none"> Please pick your top 5 infrastructure priorities | <ul style="list-style-type: none"> In total, 50 respondents participated to the question, resulting in a total 217 responses 23 responses (or 10.6%) referred to the recycling centre |
| 35 | <ul style="list-style-type: none"> Are there any other important priorities that we should consider? | <ul style="list-style-type: none"> 3 responses emphasised that the recycling centre is highly valued and requested its future location to be clarified by Camden Council |
| 36 | <ul style="list-style-type: none"> Do you have any further comments about delivery and infrastructure for the Regis Road Area? | <ul style="list-style-type: none"> 2 responses (out of a total of 34) made reference to re-provisioning the “valued” recycling centre |

Source: Regis Road Area Guidance, Public Consultation Feedback Summary dated February 2025

PRIVACY NOTICE

This notice explains how the Organiser, Paul Aikkila, will use the personal information provided by signatories of this document. The information collected is limited to: Name, Address, relationship with Kentish Town / Camden, signature (the **Information**).

The Information is solely collected for the purposes of providing Camden and the Recipients with collective feedback pertaining to certain aspects of Camden's Local Plan (2025) and the adopted Regis Road Area Guidance Supplementary Planning Document dated 10 March 2025.

Each signatory has consented to the Organiser providing the Recipients with the Information. The Organiser shall not share the Information with any party other than the Recipients without consent of the signatories. The Recipients are not authorised to use the Information for any purpose other than addressing aspects related to Camden's Local Plan 2025, the Regis Road Area Guidance Supplementary Planning Document dated 10 March 2025, and development and design related matters related to the Camden Film Quarter development project.

The Organiser will retain the Information only for as long as necessary to achieve the objectives stated under section "Stated Objectives" of this letter. Each signatory retains all rights under UK GDPR, including, without limitation, rights to be informed, rights of access, right of rectification, right to erasure, right to restrict processing, right to object, right to withdrawn consent. These can be exercised by contacting the Organiser.

The Organiser assumes no responsibility for any misuse of the Information by any of the Recipients.

Date: Fri, 27 Jun 2025 11:19:22 +0100
From: Guy Morris
To: [redacted]
Subject: Site C27 of the Draft Camden Local Plan - Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Dear Sir/Madam,

For the reasons outlined below, I am of the firm opinion that the allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. Furthermore, I 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).

I 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

I 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, I 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 concerns raised in this representation are accorded the attention they merit.

Yours faithfully

Guy Morris



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

27 June 2025

Dear Sir or Madam

REPRESENTATIONS TO 'DRAFT NEW CAMDEN LOCAL PLAN' CONSULTATION ROYAL FREE LONDON NHS FOUNDATION TRUST

We write on behalf of the Royal Free London NHS Foundation Trust ("the Trust") to submit representations in response to the London Borough of Camden's Regulation 19 'Draft New Local Plan' consultation.

This consultation is relevant to the Trust given its land interests within the London Borough of Camden ("LBC / the Council"), notably the Royal Free Hospital and Queen Mary's House. It is also relevant, given the fundamental requirement for the Draft New Local Plan to support and prioritise the Trust's Estate Strategy and the ongoing and future delivery of vital healthcare-related services which it provides within the Borough.

These representations build upon, and should be read alongside, previous comments submitted by the Trust in response to the Council's earlier Local Plan consultation stages.

TRUST BACKGROUND

As set out in previous representations, the Royal Free London NHS Foundation Trust is one of the country's best known and foremost healthcare providers that delivers a wide range of healthcare services, including highly-specialised services, from various sites across north London. Its largest facility is the Royal Free Hospital (RFH) on Pond Street which is also a major teaching hospital.

As a leading NHS Foundation Trust, the Trust is an innovator in treatments / models of care, and an early adopter of new technology. The healthcare sector is one of continual (and quite rapid) innovation and change, some of which has implications in terms of space configuration and utilisation. Consequently, it is essential that Trusts are able to exercise a great degree of flexibility in the use of their buildings and landholdings.

OVERALL COMMENTS ON DRAFT NEW LOCAL PLAN

Overall, the Trust broadly supports:

- That the Council is preparing its new Local Plan as a means of delivering "the Council's vision for future development in Camden over the next 15 years" (as set out in Paragraph 1.1 of the Draft Local Plan). Once adopted, this document

should provide a detailed and robust policy framework for new development proposals within the Borough, delivering a series of important public benefits in the process.

- The Council's aspiration to deliver significant additional new homes within the London Borough of Camden during the plan period (a target of a minimum of 11,550 additional homes is identified during the period between 2026/27 and 2040/41). Overall, the Trust supports the principle of the Council addressing its current and future housing needs through prioritising redevelopment on suitable, available and deliverable sites (prioritising brownfield redevelopment and surplus public land in the first instance).
- The principle of preparing a 'social and community infrastructure' focussed policy (Draft Policy SC3), geared towards the Council 'working with its partners' to ensure that important local and community facilities and services are developed and modernised to meet the changing needs of the Borough.
- The principle of preparing a site allocation for Queen Mary's House (Draft Site Allocation N3) which allows for this site's redevelopment for alternative uses in the future.

In addition to the above, more detailed comments on the Draft New Local Plan have been provided below. It is essential that the below comments are addressed within future versions of the Draft New Local Plan to ensure that its policies are robust, 'sound' and fit-for-purpose in relation to the Trust and its Estate Strategy.

DETAILED COMMENTS ON SPECIFIC DRAFT POLICIES

Draft Policy SC2 (Social and Community Infrastructure)

As set out above, the Trust broadly supports the principle of the Council preparing a policy geared towards ensuring the development and delivery of modern social and community infrastructure facilities within the Borough. As currently worded, Draft Policy SC3 (Social and Community Infrastructure) notably sets out that:

- The Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services to mitigate the impact of development.
- The Council will support the provision of new, improved and extended social and community infrastructure proposals (providing that various design and operational criteria are addressed).
- The Council will seek to safeguard social and community infrastructure unless one of the following tests is met, including:
 - A replacement facility of a similar nature is provided, that meets the needs of the local population, or its current, or intended, users; or,
 - The existing premises are no longer required, or viable, in their existing use and there is no alternative social or community use capable of being accommodated on the site. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a social or community use, then the preferred alternative will be the maximum viable amount of affordable housing.

In response to the above, and to ensure that Draft Policy SC2 is robust, effective and appropriately worded, the following updates are recommended:

Loss of Community / Social Infrastructure (as part of estate rationalisation programme)

As set out in our previous representations whilst Draft Policy SC2 currently identifies certain exceptions/circumstances which may justify a loss of social/community infrastructure, it fails to recognise that the loss of such facilities may be acceptable in an event where proposals form part of a wider estate rationalisation / improvement strategy. As such, it fails to accord with the requirements and aspirations of London Plan Policy S1 (Developing London's Social Infrastructure) which encourages development proposals to 'make the best use of land, including the public sector estate' through the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities. Policy S1 further states that the loss of social infrastructure is permitted where *'the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services'*.

We are still of the view that it is fundamental that Draft Policy SC3 be updated to more closely align with London Plan Policy S1. In short, the policy should be re-worded to allow for a loss of social/community infrastructure floorspace (including healthcare-related facilities) where it can be demonstrated that this forms part of an estate rationalisation programme which will deliver facilities to meet future population needs or to sustain and improve services.

Draft Allocation N3 (Queen Mary's House)

Draft Allocation N3 of the Draft New Local Plan seeks to allocate Queen Mary's House for delivery of 'permanent self-contained homes'. Notably, as currently worded, the allocation:

- Identifies an indicative capacity of '98 self-contained homes' on-site; and
- Requires that:
 - The 'original Queen Mary's House' building be retained as it is of 'historical interest'.
 - At least an 'equivalent amount of affordable housing floorspace to the existing' be retained or re-provided on-site.
 - The sylvan character of the site be preserved (and any future applications should be accompanied by an arboricultural assessment).
 - Redevelopment proposals be designed to be of a scale that fits into the prevailing 'low scale character' of the area; and
 - The existing 'listed wall' on Heath Street be retained through redevelopment proposals.

The Trust strongly supports the principle of allocating Queen Mary's House for alternative uses in the future to support the Trust's wider estate strategy. However, to ensure that Draft Allocation N3 is robust and fit-for-purpose, it is fundamental that it is updated as follows:

Indicative Site Capacity

In one of the Council's Local Plan consultation documents (Individual Development Sites, 2020) Queen Mary's House was identified as having an indicative housing capacity of 150 additional homes. This was reduced to 80 self-contained homes in the Regulation 18 Draft New Local Plan, and now the indicative capacity has been increased to 98 self-contained homes in the current Regulation 19 Draft New Local Plan.

It is fully appreciated that the quantum of development acceptable on the site will be dependent on detailed design and will need to be justified in planning, design, townscape / heritage and environmental terms. However, to ensure the optimisation of the site for delivery of new homes, it is requested that the indicative capacity point is again increased to circa 150 homes. This approach would align with Draft Policy H1 (Maximising Housing Supply) of the New Draft Local Plan which states the

Council will seek to “*optimise the homes delivered on all sites using a design led approach, and benchmarking against nationally described housing standards to make the maximum reasonable provision for housing...*”

Not only will the above approach ensure that the opportunity to sensitively optimise the delivery of new homes on-site is realised, it will also help maximise the receipt achieved by the Trust to cross-subsidise and deliver on its wider estate strategy and associated public benefits.

Principle of Demolishing / Retaining On-site Buildings

Draft Allocation N3 currently requires the ‘original building’ on the Queen Mary’s House site to be retained as it is of historical interest, in addition to requiring justification if any substantial demolition of other existing buildings on-site is proposed. It states that ‘Queen Mary’s House was built in 1920s and is considered to be of historic significance’. It is however worth noting that only part was built in the 1920s with significant amount of the built form being constructed around the 1990s.

Queen Mary’s Hospital falls within the Hampstead Conservation Area and falls within sub area seven: Whitestone Pond (within the corresponding Hampstead Conservation Area Statement). Importantly, the ‘original Queen Mary’s House’ building is not statutorily or locally listed and is referred to as a building which makes a neutral contribution to the Hampstead Conservation Area within the Conservation Area Statement. Therefore, it is considered that the text ‘*as it is of historical interest*’ should be removed from Draft Allocation N3.

As it stands, the requirement to retain the original building on-site (and the potential retention of other buildings on-site) is too inflexible and could result in the full development potential of this site being overly restricted. Instead, Draft Allocation N3 should allow for the principle of demolition to be explored, and potentially acceptable, when justified in design, townscape, planning and environmental terms.

As set out in previous representations, this approach would result in increased flexibility and would help ensure that future redevelopment proposals on-site sensitively optimise the delivery of much-needed new homes (whilst paying due regard to other key Local Plan policies and aspirations). It would also ensure that the cross-subsidy benefits associated with the disposal of the Site, and the opportunity to re-invest sales receipts into vital healthcare-related services elsewhere in the Borough and to deliver unignorable public benefits, is fully realised.

Existing Key-worker Accommodation On-site

Draft Allocation N3 currently inaccurately states that there is existing affordable housing on-site, which emerging development proposals should seek to retain or replace.

As set out within previous representations submitted to the Council, there is an element of existing nurses / ancillary health worker accommodation at Queen Mary’s House. The existing facilities are outdated and require significant intervention to modernise. However, subject to the demand and need for this accommodation this could either be re-provided on-site or at an alternative location.

Given the above, Draft Allocation N3 should be updated to accurately reflect this context. Any references to ‘existing affordable housing’ should be amended to ‘nurses / ancillary health worker accommodation’. In addition, the allocation should allow for a flexible approach to re-providing nurses / ancillary health worker accommodation to reflect the Trust’s need and demand. It should also allow for an event where a suitable off-site location is identified by the Trust in the future.

Royal Free Hospital (Pond Street)

In the previous iteration of the Local Plan (Draft New Camden Local Plan – Regulation 18 Consultation Version January 2024) Appendix 1: Infrastructure Schedule sets out the LB Camden’s key infrastructure projects and associated programme. The Trust supported the inclusion of the Royal Free Hospital Masterplan. However, requested a number of small amendments.

It is however noted that Appendix 1 has been removed from the drafting. It is therefore requested that an Infrastructure Schedule is re-introduced, and the Royal Free Hospital is re added and takes into consideration the following:

Project / Programme Description: Royal Free Hospital Estate Strategy / ongoing optimisation.

Comments: The Estate Strategy will set out the Trust’s requirements and opportunities for growth and development as a leading health and research campus with complementary uses that support the onsite health offer including housing, commercial and research uses and community and leisure facilities.

The Trust welcome further discussions with the LB Camden throughout the drafting of the Local Plan to ensure that the Trust’s Estate Strategy is supported and reflect within the Local Plan.

CLOSING

The Trust remains committed to working proactively with the Council to ensure that the Draft New Local Plan is robust, soundly prepared and fit-for-purpose.

As set out above, the Trust broadly supports the Council in its visionary aspiration to prepare a new Local Plan which properly and effectively plans for the future needs of the Borough. However, as it stands, it is fundamental that the above comments be addressed within future iterations of this document. This will ensure that the future development aspirations of the Trust, and the ongoing and efficient delivery of the vital services which it provides, are properly supported and prioritised.

The Trust welcome further dialogue and correspondence with the LB Camden throughout the emerging Local Plan process to ensure the Local Plan process and the Trust’s Estate Strategy complement and enhance each other.

Please do not hesitate to contact Anna Russell-Smith ([REDACTED]) should you wish to discuss the above in further detail. Please also continue to keep Montagu Evans updated as preparation of the Council’s new Local Plan progresses.

Yours faithfully,

Montagu Evans

MONTAGU EVANS

Responder 488

Date: Fri, 27 Jun 2025 10:21:26 +0000
From: Aimee Whitehead
To: PlanningPolicy
Subject: RE: Consultation on proposed Draft Local Plan Submission Version

Hello,
Please find attached Representations to the Camden Local Plan: Proposed Submission Draft (Regulation 19), on behalf of Big Yellow Self Storage Company Ltd.
If you could confirm receipt of these, that would be appreciated.
Kind regards,
Aimee

Aimee Whitehead
BSc (Hons) MSc
Senior Planner

T: [redacted]
M: [redacted]
[\[redacted\]
dwd-ltd.co.uk](mailto:[redacted]@dwd-ltd.co.uk)

Chartered Surveyors & Town Planners
[redacted address], London, [redacted postcode]

DWD is the trading name of DWD Property and Planning Limited, a subsidiary of RSK Environment Limited. Registered in England No. 15174312. Registered Office: Spring Lodge, [redacted address], Helsby, Cheshire, England, [redacted postcode]. This e-mail (and any attachments) may be confidential and privileged and exempt from disclosure under law. If you are not the intended recipient, please notify the sender immediately and delete the email. Any unauthorised disclosure, copying or dissemination is strictly prohibited.

From: Kate Goodman <[redacted email]>

Sent: 01 May 2025 09:02

To: PlanningPolicy <[redacted email]>

Subject: Consultation on proposed Draft Local Plan Submission Version

We are writing, to let you know that the Council has published the Camden Local Plan Proposed Submission Draft for consultation, as you have previously responded to our consultations on the Local Plan last year.

The draft new Local Plan sets out the Council's vision for future development in Camden for the next 15 years and includes planning policies and site allocations to help achieve this.

When making representations on the Camden Local Plan Proposed Submission Draft the following questions should be considered:

- Is the plan legally compliant?
- Does the plan comply with the 'Duty to Cooperate'?
- Is the plan 'sound'?

All representations 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 for Communities and Local Government and must be made publicly available.

How can I get involved?

To find out more and comment on the Local Plan please visit the Council's website: [Draft new Local Plan - Camden Council](#)

Paper copies are available to view at:

- **Pancras Square Library**, [redacted address] N1C 4AG.
- **Highgate Library**, Chester Road, [redacted postcode]
- **Holborn Library**, 32 - [redacted address], WC1X 8PA
- **West Hampstead Library**, Dennington Park Road, [redacted postcode]
- **Kentish Town Library**, 262 - [redacted address], [redacted postcode]

For library details and opening times please see:

<http://www.camden.gov.uk/ccm/navigation/leisure/libraries-and-online-learning-centres/> .

Other documents that support the Camden Local Plan Submission Draft 2025 are available to view on the Council's website [Evidence - Camden Council](#)

How can I comment?

We would encourage all comments to be made using our representation form. This can be downloaded from the Council's website [Draft new Local Plan - Camden Council](#)

Comments can also be made:

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

By post: Planning Policy, Camden Town Hall, Judd Street, London, [redacted postcode]

Comments must be received by 5pm on 27 June 2025.

Please note that comments submitted to the Council cannot be treated as confidential.

What happens next?

The review of the Local Plan has to follow a statutory process. Once the consultation on the Camden Local Plan Proposed Submission Draft has closed, representations received will be submitted with the Plan and supporting documents to the government in the Autumn for examination by a Planning Inspector.

If you would like to be notified:

- when the Camden Local Plan has been submitted for independent examination;
- about the publication of the Planning Inspectorate Report; and / or
- about the adoption of the Camden Local Plan

please contact the Planning Policy Team on [\[redacted email\]](#) to be added to our mailing list or if you wish to be removed from this mailing list

Regards

Planning Policy Team

Kate Goodman

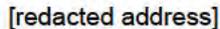
Principal Planner

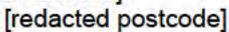
Economy, Regeneration and Investment

Supporting Communities

London Borough of Camden

Tel: 



London 

Please consider the environment before printing this email.

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

Date: 26th June 2025
Your Ref: 15564

DWD

Camden Council
2nd Floor, 5 Pancras Square
Kings Cross
London



Dear Sir or Madam

**CAMDEN COUNCIL: CAMDEN LOCAL PLAN – PROPOSED SUBMISSION DRAFT (REGULATION 19)
REPRESENTATIONS ON BEHALF OF .BIG YELLOW SELF STORAGE COMPANY LIMITED**

We write on behalf of our client, .Big Yellow Self Storage Company Limited (**'Big Yellow'**) to make formal representations to the Camden Local Plan: Proposed Submission Draft (Regulation 19) consultation, with respect to their freehold ownership at Alpha House, 24-27 Regis Road, Kentish Town.

On 5th July 2024, Big Yellow obtained planning permission, which was allowed at appeal (Camden App Ref: 2023/0093/P, Appeal Ref: APP/X5210/W/24/3337347) (**'the Big Yellow planning permission'**), for the following redevelopment of Alpha House:

'Demolition of the existing building and the construction of a self-storage facility (Use Class B8) and flexible office space (Use Class E(g)(i)), together with vehicle and cycle parking and landscaping.'

Big Yellow commenced development and implemented the above referenced planning permission in February 2025, and they are proceeding to build out the development with practical completion anticipated for 2026.

Draft Local Plan Policy Position

Alpha House remains designated within the Kentish Town Regis Road and Holmes Road Depot Growth Area (**'the Growth Area'**), which pertains to Policy C2 **'Regis Road and Holmes Road Depot'** in the Proposed Submission Draft of the Camden Local Plan and an expansion of the adopted **'Kentish Town Regis Road Growth Area'** to include the Holmes Road depot site owned by Camden Council.

The draft plan identifies the Growth Area to be a location where significant growth is expected to be delivered in the Borough over the Local Plan period (2026-2041). To achieve such growth, draft Policy C2 seeks to encourage regeneration and intensification and expects the wider Growth Area to be redeveloped to deliver a mix of uses that are employment-led. It expects intensification of the Growth Area to be delivered through mixed use development, including housing, industry, offices, start-ups and the re-provision of the existing recycle centre.

It is acknowledged that the following is stated in draft Allocation C2 as **'context'**:

'Proposals should be progressed through a comprehensive masterplanning process, informed by the Kentish Town Planning Framework and the Regis Road Area Guidance, which has been prepared by the Council as an addendum to the Planning Framework.'



Acknowledgement of Big Yellow development at Alpha House

There is no reference or further clarification that Big Yellow has implemented a planning permission to redevelop Alpha House, being a central parcel of land within the Growth Area, and will be built out in accordance with the approved plans. Big Yellow therefore **strongly request** that wording is added to make it clear that other development in the Growth Area should be cognisant of and take into account the fact that development on the Alpha House plot will be built out in accordance with the extant planning permission.

Deliverability of a Comprehensive Masterplan

Furthermore, given the multiple number of landowners across the Growth Area, it is Big Yellow's opinion that it will take many, many years before collaboration of all ownerships becomes possible, if at all. The Council have acknowledged that a comprehensive scheme for the entirety of the Growth Area will not be possible, given another (in addition to Big Yellow) significant landowner (owning approx 35% of the Growth Area) within the Growth Area have already stated their intention unequivocally not to collaborate in the evolution of a comprehensive masterplan based on their commercial interests. Therefore, any masterplan that is developed within the Growth Area would not be 'comprehensive' and, in any event, would instead represent 'piecemeal' development in policy terms.

Big Yellow acknowledges the intent set out in draft Allocation C2 that the Council seek the redevelopment of the Growth Area to be comprehensively masterplanned. However, this is a very **inflexible** approach to delivering large-scale regeneration of an area from a policy perspective – especially considering the recent Supreme Court judgment *Hillside Parks Ltd v Snowdonia National Park Authority [2022] UKSC30* – given a comprehensive masterplan for the entire area cannot be formulated due to multiple landowner constraints.

It is highly likely that a comprehensive masterplan of the entire Growth Area is **undeliverable**, and the Council should be concerned that regeneration of the area and the contribution the Growth Area is intended to make towards meeting the draft Local Plan's strategic objectives will not be delivered during the draft new plan period (2026-2041), if piecemeal development proposals are resisted as a principle.

For the reasons provided above, it is Big Yellow's opinion that piecemeal redevelopment proposals should be considered an acceptable approach in-principle within the Growth Area and clearly stated as such within draft Allocation C2. By not doing so, it is Big Yellow's opinion that the regeneration of the wider Growth Area will likely be undelivered for many years.

Regis Road

Paragraph 24 under the 'Infrastructure Requirements' of draft Allocation C2 states that the development must '*ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles on to a separate service road in advance of any significant commercial development. This should be included as part of the Phasing Plan required for the development.*'

Given Big Yellow are likely to complete their development before any comprehensive masterplan is progressed, it is highly likely that any subsequent wider redevelopment in the Growth Area will take place once the new Big Yellow Store has been built and is in operation. Regis Road is intended to be the only access route to the new Big Yellow store, so draft Allocation C2 should account for this by making it clear that vehicular and pedestrian access to the store via Regis Road is always maintained.

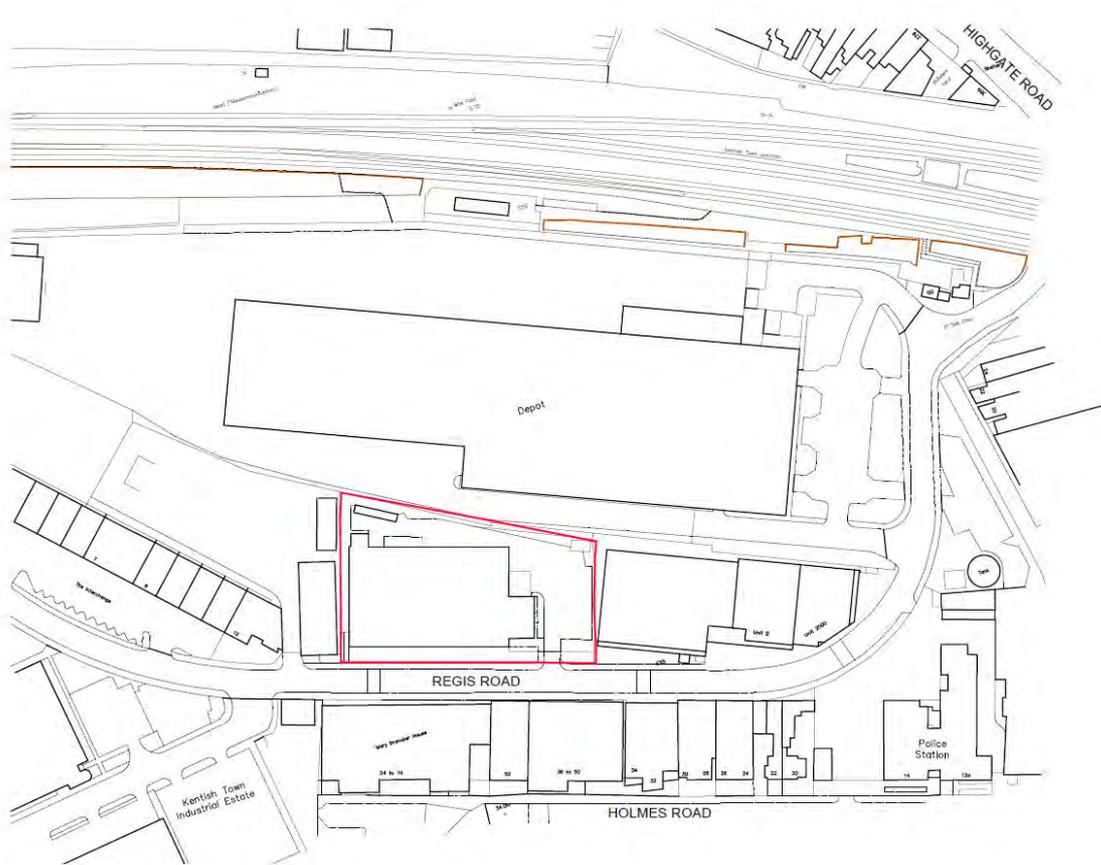
I would be grateful if you could please confirm receipt of these representations and keep me informed of any further consultations moving forward. If you require any further information, please do not hesitate to me via the undersigned.

Yours faithfully,

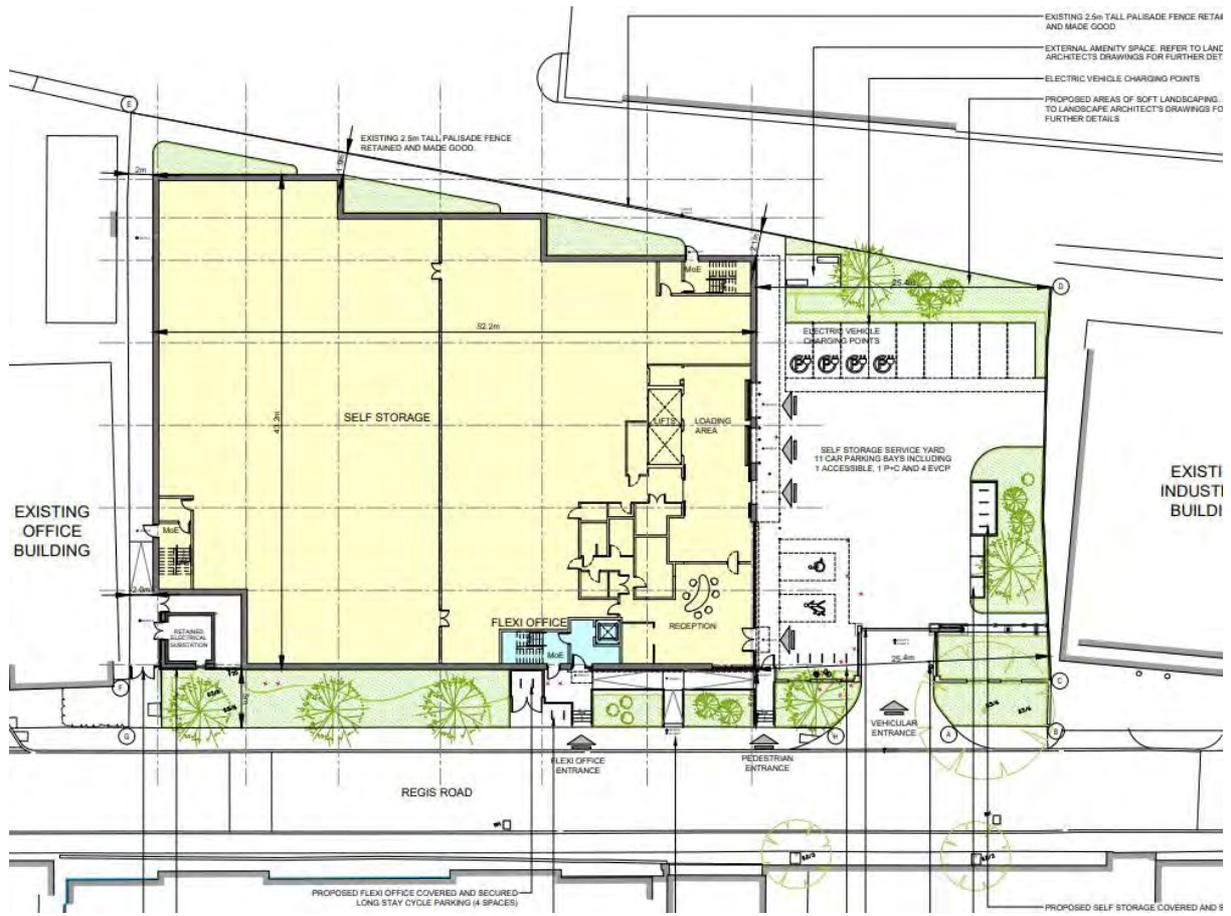
[Redacted]
Andrew Deller

[Redacted]
[Redacted]
[Redacted]
[Redacted]

APPENDIX A – SITE LOCATION PLAN



APPENDIX B – APPROVED SITE PLAN (APPROVED AT APPEAL REF: APP/X5210/W/24/3337347)



Responder 489

Date: Fri, 27 Jun 2025 11:24:02 +0100

From: Robbie Gibbons

To: [redacted]

Subject: Regis Road site: proposed relocation of recycling site

I write to object to the proposed relocation of the Camden recycling site from its current location to a new location placed substantially closer to homes and schools.

I am very supportive of the recycling site remaining in the Regis Road vicinity. However its proposed relocation moves it to a site extremely close to a primary school and existing homes. It appears the proposed new location has been designed to move it further away from the proposed new homes on the Regis Road site to make the developer's proposed new homes more attractive to new buyers, but at the expense of existing Camden residents and schoolchildren.

I also note that the specific proposed location did not form part of the consultation exercise undertaken in 2024 and the local community has therefore been denied an opportunity to express its views on the move closer to existing homes. The adoption of the specific site without community consultation is highly problematic.

I urge the planning officers and councillors to take into account the impact on schoolchildren and existing local residents of the proposed move of site and require the recycling site to either remain in its current location or be placed on a site bordering the railway line to ensure it does not negatively impact current residents and children.

All the best,

Robbie

Responder 490

Date: Fri, 27 Jun 2025 11:28:43 +0100
From: belinda low
To: [redacted]
Subject: Recycling centre

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

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

To whom it may concern .
It is not appropriate to have the recycling Centre in a resident area next to a primary school.
Please reconsider this.

Kind regards,
Resident for [redacted address].

Sent from my iPhone

Responder 491

Date: Fri, 27 Jun 2025 10:31:25 +0000
From: michael hill
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan Response

Please see my response to the draft local plan. I have included it in an easy to read letter format and on the form requested on the Camden council website.

Kind regards,

Michael

Camden YIMBY

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

| | | |
|----------------------------------|--------------------------------------|----------------------|
| Title | <input type="text" value="Mr"/> | <input type="text"/> |
| First Name | <input type="text" value="Michael"/> | <input type="text"/> |
| Last Name | <input type="text" value="Hill"/> | <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"/> |

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: Michael Hill, [REDACTED]

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

Documents can be found at the following links:

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

Paragraph Policy Policies Map

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

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

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

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

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

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

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

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

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

Conflict with NPPF

- NPPF Paragraph 61 requires plans to meet the **full objectively assessed housing need (OAN)**, calculated using the Government’s Standard Method unless

exceptions apply.

- Camden's evidence (Standard-Method calculation, 2024 base year) indicates a need for **≈ 3,137 dwellings per annum (dpa)**.
- Draft Policy H1 instead rolls forward the London Plan capacity figure of **1,038 dpa**, giving **11,550 homes 2026-2041** – barely one-third of the OAN.

Soundness Failings

- *Positively Prepared*: plan does not seek to meet identified need.
- *Consistent with National Policy*: no Green Belt or environmental constraint is cited to justify the shortfall; no Statement of Common Ground shows redistribution.

Duty to Co-operate failings

- The above is also a clear Duty to Co-operate failing. Inspectors should halt the plan at submission stage as they did with the plans for St Albans and Sevenoaks.

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.

Either (a) raise the borough requirement to ~3,137 dpa (plus backlog) with supporting site allocations and minimum densities, or (b) produce Statements of Common Ground with neighbouring LPAs and the Mayor demonstrating how the ~2,100 dpa gap will be met elsewhere.

(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:

My representations raise **duty-to-co-operate and soundness** objections on which I wish to test the Council's evidence, respond to any late material, and assist the Inspector in exploring reasonable modifications.

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

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Part B – Please use a separate page for each representation

Name or Organisation: Michael Hill, [REDACTED]

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

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

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

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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.

Conflict with NPPF Para 65

National policy prohibits affordable-housing obligations on schemes of fewer than 10 dwellings (except in designated rural areas). Draft Policy H4 seeks contributions from any scheme adding ≥ 1 dwelling or ≥ 100 m². The requirement therefore:

- Breaches the letter of Para65.
- Risks suppressing gentle densification and SME-builder activity, contrary to NPPF's

objective to “significantly boost” supply (Para 60).

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

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

Remove the small-site requirement or provide (i) borough-wide viability evidence and (ii) a rural-area exemption assessment demonstrating compliance with Para 65 footnote.

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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No

Yes

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Name or Organisation: Michael Hill, Camden YIMBY

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Paragraph Policy Policies Map

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NPPF 125(e) encourages LPAs to “support opportunities to use the air-space above existing residential and commercial premises for new homes.”

Draft Policy D4’s tests of subordination and volumetric proportionality, without any positive wording supporting upward extensions, discourage mansards, additional storeys and loft conversions routinely permitted in peer boroughs.

Comparative Benchmarking

- Lambeth Local Plan 2021 Policy Q11 actively supports roof extensions where well-designed.
- Tower Hamlets “Central Area Good Growth” SPD 2021 promotes upward extensions to create new dwellings.

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.

Insert a new clause explicitly supporting upward & outward extensions that meet design-code criteria, thereby aligning with NPPF and London Plan D3 “optimum development potential”. All houses with ‘London’ or ‘Butterfly’ roofs should be given automatic permission to add Mansard extensions. effort to inform owners and occupiers of these homes that they have the right to extend them.

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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| (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities) | <input type="text"/> |
| (4) Consistent with national policy | <input type="text" value="X"/> |

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

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

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

NPPF Requirement

Para 48 expects decisions “as quickly as possible and within statutory timescales”.

Performance Evidence

DLUHC Planning Performance Tables (Q4 2024/25):

| Metric | Camden | Inner-London Average | National Target |
|--------|--------|----------------------|-----------------|
|--------|--------|----------------------|-----------------|

| | | | |
|---|--------|--------|------|
| Majors decided ≤ 13 weeks (no EoT) | 20 % | 47 % | 60 % |
| Majors decided within agreed time (incl. EoT) | 84.6 % | 93.5 % | 60 % |
| Minors decided ≤ 8 weeks (no EoT) | 31 % | 51 % | 70 % |

Camden's heavy reliance on Extensions of Time masks systemic delay and these figures would be much worse if they took this into account.

Soundness Concern
 Plan is not effective: it contains no policy or implementation measure to improve decision speed, undermining investor confidence and the deliverability of housing trajectories.

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.

Add monitoring indicator and resourcing commitment to achieve ≥ 90 % on-time decisions (without Extension of Time) by 2027, plus annual reporting.

(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:

My representations raise **soundness** objections on which I wish to test the Council's evidence, respond to any late material, and assist the Inspector in exploring reasonable modifications.

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

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Part B – Please use a separate page for each representation

Name or Organisation: Michael Hill, [REDACTED]

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](#)
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Paragraph Policy Policies Map

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

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

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

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"/> |
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Issue

Draft Plan secures *no net loss* of social-rent floorspace but **sets no density uplift expectation**. Example: Agar Grove Phases 3-4 propose 496 homes on 3.1 ha – **160 dph**, well below PTAL-5 capacity potential (> 350 dph).

Conflict with NPPF

Paragraph 125(a)(c) require plans to optimise brownfield capacity and may set *minimum*

densities in high-accessibility areas.

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.

Requested Modification

For estate schemes within PTAL 4+, specify:

- Minimum **300 dph gross** density, or
- Justification where a lower figure optimises design.
- Ensure regeneration delivers **net addition of social-rent units** alongside market rate housing.

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Yes

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Name or Organisation: Michael Hill, [REDACTED]

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Paragraph Policy Policies Map

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

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Tension Between Objectives

While NPPF Para 152 supports reducing embodied carbon, Para 11 & Para 125 demand effective urban land use. A near-automatic presumption against demolition risks sterilising sites that could deliver far higher housing capacity with modern, low-carbon construction. The plan fails to take into account that residents of well connected areas like Camden have significantly lower carbon emissions than others in the country. More people moving to Camden is good for the climate.

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

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Adopt a **balanced whole-life-carbon test**: permit redevelopment where the operational-plus-embodied-carbon saving per resident or job is demonstrably greater than **refurbishment**. (Continue on a separate sheet if necessary)

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Omission

No numeric density minima in centres or PTAL 4-6 zones.

NPPF Para 125 Requirement

Plans “should contain policies to ... set minimum housing-density standards in town and city centres and other locations well served by public transport.”

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.

Introduce tiered minimums (e.g. 400 dph in CAZ locations; 350 dph in PTAL 5; 300 dph in PTAL 4, subject to design-code compliance.

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

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

 No Yes

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

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| | | | |
|-----------------------|---------------------|--------------|-------------------|
| 11. Signature: | Michael Hill | Date: | 27/06/2025 |
|-----------------------|---------------------|--------------|-------------------|

Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

- ***Positively prepared***

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

Michael Hill response to Camden Local Plan

My review of Camden's Local Plan has found multiple areas where the plan does not comply with the National Policy Planning Framework. The plan should be rejected by the planning inspector and almost certainly will be. I am eager to engage with Camden council on how this local plan can be improved and made compliant.

Executive Summary

| Draft Plan Policy / Issue | NPPF Paragraph(s) Breached | Principal Soundness Test Failing* | Remedy Sought |
|--|-----------------------------------|---|--|
| H1 – Housing Requirement | 11,61 | Not Positively Prepared / Not Consistent with National Policy | Raise requirement to c. 3,137 dpa or agree cross-boundary redistribution via Statements of Common Ground (SoCG). |
| H4 – Small-Site Affordable Housing | 65 | Not Consistent with National Policy | Remove <10-unit contribution or provide robust local viability evidence and rural-area exemption justification. |
| D4 – Extensions & Alterations | 125(e) | Not Consistent with National Policy | Amend wording to <i>encourage</i> well-designed upward & outward extensions; align with Lambeth or Tower Hamlets. |
| DM 1 Decision-Making Timeliness (plan omission) | 48 | Not Effective | Include delivery-plan & monitoring target to meet 8- / 13-week statutory deadlines; resource Planning Service accordingly. |

| | | | |
|--|--------------|-------------------------------------|---|
| H5- Estate Regeneration Density (plan omission) | 125(a)(c) | Not Positively Prepared / Justified | Insert minimum-density expectations for estates; require net increase in social-rent units plus additional market rate homes. |
| CC2 – Retention of Existing Buildings | 11, 125, 152 | Not Consistent with National Policy | Re-balance test: permit redevelopment where it demonstrably optimises housing capacity while achieving whole-life-carbon gains. |
| H1, D1, DS1, DM1 Minimum-Density Policy (plan omission) | 125 | Not Consistent with National Policy | Introduce numeric Public Transport Accessibility Level linked density minima for town centres and PTAL 4+ corridors. |

* Tests of soundness set out in NPPF Paragraph 35.

Unless the Plan is modified to resolve the above issues, the Inspector will be forced to conclude that it is **unsound and incapable of adoption**.

More detail is provided below.

1 Housing Requirement (Policy H1)

Conflict with NPPF

- NPPF Paragraph 61 requires plans to meet the **full objectively assessed housing need (OAN)**, calculated using the Government’s Standard Method unless exceptions apply.
- Camden’s evidence (Standard-Method calculation, 2024 base year) indicates a need for **≈ 3,137 dwellings per annum (dpa)**.
- Draft Policy H1 instead rolls forward the London Plan capacity figure of **1,038 dpa**, giving **11,550 homes 2026-2041** – barely one-third of the OAN.

Soundness Failings

- *Positively Prepared*: plan does not seek to meet identified need.
- *Consistent with National Policy*: no Green Belt or environmental constraint is cited to justify the shortfall; no Statement of Common Ground shows redistribution.

Duty to Co-operate failings

- The above is also a clear Duty to Co-operate failing. Inspectors should halt the plan at submission stage as they did with the plans for St Albans and Sevenoaks.

Requested Modification

Either (a) raise the borough requirement to ~3,137 dpa (plus backlog) with supporting site allocations and minimum densities, **or** (b) produce Statements of Common Ground with neighbouring LPAs and the Mayor demonstrating how the ~2,100 dpa gap will be met elsewhere.

[Citations: Camden SHMA 2024 Para 4.3; NPPF Para 11, Para 61]

2 Affordable Housing on Small Sites (Policy H4)

Conflict with NPPF Para 65

National policy prohibits affordable-housing obligations on schemes of fewer than 10 dwellings (except in designated rural areas). Draft Policy H4 seeks contributions from any scheme adding ≥ 1 dwelling or ≥ 100 m². The requirement therefore:

- Breaches the letter of Para65.
- Risks suppressing gentle densification and SME-builder activity, contrary to NPPF's objective to "significantly boost" supply (Para 60).

Requested Modification

Remove the small-site requirement or provide (i) borough-wide viability evidence and (ii) a rural-area exemption assessment demonstrating compliance with Para 65 footnote.

[Citations: Draft Local Plan Policy H4(1)(a); NPPF Paragraph 65]

3 Extensions & Alterations (Policy D4)

Conflict with NPPF Para 125(e)

NPPF 125(e) encourages LPAs to “*support opportunities to use the air-space above existing residential and commercial premises for new homes.*”

Draft Policy D4’s tests of subordination and volumetric proportionality, without any positive wording supporting upward extensions, discourage mansards, additional storeys and loft conversions routinely permitted in peer boroughs.

Comparative Benchmarking

- Lambeth Local Plan 2021 Policy Q11 actively supports roof extensions where well-designed.
- Tower Hamlets “Central Area Good Growth” SPD 2021 promotes upward extensions to create new dwellings.

Requested Modification

Insert a new clause explicitly supporting upward & outward extensions that meet design-code criteria, thereby aligning with NPPF and London Plan D3 “optimum development potential”. All houses with ‘London’ or ‘Butterfly’ roofs should be given automatic permission to add Mansard extensions. There should then be a proactive effort to inform owners and occupiers of these homes that they have the right to extend them.

[Citations: NPPF Para 125(e); Camden Draft Local Plan Para 12.37; Lambeth Policy Q11; Tower Hamlets Central Area Good Growth SPD 2021]

4 Timeliness of Planning Decisions (Plan-wide Omission) Should be considered under DM1

NPPF Requirement

Para 48 expects decisions “*as quickly as possible and within statutory timescales*”.

Performance Evidence

DLUHC Planning Performance Tables (Q4 2024/25):

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| Majors decided ≤ 13 weeks (no EoT) | 20 % | 47 % | 60 % |
| Majors decided within agreed time (incl. EoT) | 84.6 % | 93.5 % | 60 % |
| Minors decided ≤ 8 weeks (no EoT) | 31 % | 51 % | 70 % |

Camden's heavy reliance on Extensions of Time masks systemic delay and these figures would be much worse if they took this into account.

Soundness Concern

Plan is not effective: it contains no policy or implementation measure to improve decision speed, undermining investor confidence and the deliverability of housing trajectories.

Requested Modification

Add monitoring indicator and resourcing commitment to achieve ≥ 90 % on-time decisions (without Extension of Time) by 2027, plus annual reporting.

5 Estate Regeneration & Density

Issue

Draft Plan secures *no net loss* of social-rent floorspace but **sets no density uplift expectation**. Example: Agar Grove Phases 3-4 propose 496 homes on 3.1 ha – **160 dph**, well below PTAL-5 capacity potential (> 350 dph).

Conflict with NPPF

Paragraph 125(a)(c) require plans to optimise brownfield capacity and may set *minimum* densities in high-accessibility areas.

Requested Modification

For estate schemes within PTAL 4+, specify:

- Minimum **300 dph gross** density, or
- Justification where a lower figure optimises design.

Ensure regeneration delivers **net addition of social-rent units** alongside market rate housing.

6 Retention of Existing Buildings (Policy CC2)

Tension Between Objectives

While NPPF Para 152 supports reducing embodied carbon, Para 11 & Para 125 demand effective urban land use. A near-automatic presumption against demolition risks sterilising sites that could deliver far higher housing capacity with modern, low-carbon construction. The plan fails to take into account that residents of well connected areas like Camden have significantly lower carbon emissions than others in the country. More people moving to Camden is good for the climate.

Requested Modification

Adopt a **balanced whole-life-carbon test**: permit redevelopment where the operational-plus-embodied-carbon saving per resident or job is demonstrably greater than refurbishment.

7 Minimum-Density Standards

Omission

No numeric density minima in centres or PTAL 4-6 zones.

NPPF Para 125 Requirement

Plans *“should contain policies to ... set minimum housing-density standards in town and city centres and other locations well served by public transport.”*

Requested Modification

Introduce tiered minimums (e.g. 400 dph in CAZ locations; 350 dph in PTAL 5; 300 dph in PTAL 4) subject to design-code compliance.

Conclusion

In its present form the draft Camden Local Plan:

- fails multiple NPPF requirements on housing need, affordable-housing thresholds, density optimisation and decision timeliness;
- lacks proportionate evidence to justify deviations; and
- has not demonstrated effective cross-boundary cooperation.

Unless the Council accepts **main modifications** addressing points 1-7 above, the Plan is **unsound** and the Inspector should recommend non-adoption under **Planning and Compulsory Purchase Act 2004 Paragraph 20(7)**.

I am eager to engage constructively with the Council and the Inspector to achieve a plan that truly delivers the homes and sustainable growth Camden needs.

Kind regards,

Michael Hill

Head of Policy, Camden Yimby and Camden Resident

Date: Fri, 27 Jun 2025 10:37:22 +0000
From: CONSTANTINE JOHN ZOGRAPHOS
To: planningpolicy@camden.gov.uk, Nasrine Djemai –, Kemi Atolagbe –, Rebecca Filer –
Subject: Site Allocation C27 – Land East of Constable House, Adelaide Road (Gypsy and Traveller Site) - of Draft Local Plan

I write to you on this matter above and wish to object to the proposed allocation of site C27 for Gypsy and Traveller accommodation as set out within the Camden Local Plan Proposed Submission Draft.

I would respectfully request the modification that Site Allocation C27 - Land adjacent to Constable House Adelaide Road. NW3 3QA, - for Gypsy and Traveller accommodation, be removed from the draft 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

Reasons:

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 numbers of mature holly trees – between 30 and 60 depending on the exact site. .
3. 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.
4. 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. .
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. Playground: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

The 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.

Additionally, there has also been sufficient consultation with local residents in relation to the proposed use of this site. It seems that many residents, including of the Etons and Constable House, are still unaware of the proposals or have only very recently become aware.

Request:

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

Yours sincerely

Constantine John Zographos

Responder 493

Date: Fri, 27 Jun 2025 10:39:06 +0000
From: Rebecca Trenner
To: PlanningPolicy
Subject: Regis Road Recycling move plan

My objections are the following

1. The current site on Regis Rd works perfectly well as it is distanced from residential properties.
2. The rights of existing residents should take precedence over Yoo's development and profit motive.
3. The proposed site is too close to homes in a conservation area
roads too narrow to allow more traffic
too close to St Patrick's Primary school.
increased heavy traffic will deter parents taking children to school on foot.
heavy lorry traffic will increase danger of parents and children cycling and walking to school.
St Patrick's school was not informed about this proposal until IARA residents informed them.
already restrictions in place for clean air goals which will be wiped out with heavy lorries accessing the site.
unacceptable noise pollution so close to residential homes.
pedestrian access from Holmes road too close to both St Patrick's and our quiet residential area.
4. Flawed planning process
the details of this development were buried in the consultation on the Yoo development which constitutes deceptive practice.
consultation too short to allow proper scrutiny.
failure to take into account the obliteration of the value of CURRENT residents' properties which will result.
recent court judgements regarding deceptive council consultations.
5. **Strong local objections** now that the plan has come to light.

In addition, I have a disabled adult daughter who uses a wheelchair. Turning and manoeuvring lorries are a particular danger to the disabled. You didn't put a lift into Kentish Town tube station and every disability group has lobbied against floating bus stops. Your disregard for disabled people, the elderly and families is once again shown by trying to sneak this proposal through.

Regards,
Rebecca Trenner
[redacted address]
London [redacted postcode]