

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

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

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="James"/>	<input type="text"/>
Last Name	<input type="text" value="Fenwick"/>	<input type="text"/>
Job Title	<input type="text" value="Associate director"/>	<input type="text"/>
Organisation	<input type="text" value="D3 Projects"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

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

Name or Organisation: d3 projects
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**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.  
Documents can be found at the following links:

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

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

(1) Legally compliant	Yes	<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)	Yes	<input type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	Yes	<input type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	Yes	<input type="checkbox"/>
(4) Consistent with national policy	Yes	<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) - <i>ASUC Representation on Camden Local Plan Proposed Submission Draft - 27 June 2025</i>
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I agree with the objections made and the support given in the ASUC representation regarding Policy D6 Basements

I would like to add that our company employs 30 people who work in the sector.

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.

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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:

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

(a) when the Camden Local Plan has been submitted	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 <sup>th</sup> June 2025
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
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- 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.
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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.

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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 495

Date: Fri, 27 Jun 2025 11:45:12 +0100

From: Lada Recna

To: [redacted]

Subject: Camden local plan objections to site C27, Land East of Constable House, Adelaide Road ( Gypsy and Traveller site)

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Regards,

LR

Responder 496

Date: Fri, 27 Jun 2025 12:06:12 +0100

From: Jemma Hollowell

To: [redacted]

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

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

## **Personal Details**

Jemma Hollowell

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Planning officer,

I am writing to object to the proposed development of traveller accommodation on land known as C27, adjacent to Constable House, under Policy H11 of Camden's Local Plan and associated planning frameworks.

### **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

While I fully respect the rights of Gypsy, Roma and Traveller communities to access suitable accommodation, I believe this particular proposal is inappropriate for the following planning-based reasons:

#### **1. Incompatible Land Use and Impact on Residential Amenity**

The site is located directly adjacent to Constable House, a residential development where families, children and elderly residents live in close proximity. A traveller site in this location would introduce a fundamentally different and potentially incompatible land use, with the potential for increased noise, disruption, and traffic, contrary to policy H11. This could lead to a loss of residential amenity and undermine the established character of the local area.

#### **2. Inadequate Access and Road Safety Concerns**

Access to the C27 site is constrained and unsuitable for the types of vehicles typically used in traveller accommodation (e.g. caravans and trailers). The surrounding road network, including access routes around Constable House, is not designed to safely accommodate increased vehicular movements, posing a significant safety risk for pedestrians and residents, especially children. Access would also be immediately opposite the access to Eton Place.

This fails to comply with Policy H11, which requires safe and convenient access to the site.

#### **3. Lack of Local Infrastructure and Support Services**

There appears to be no evidence that consideration has been given to the availability of appropriate infrastructure to support the additional population, including refuse collection, sanitation, play space for children, or nearby health and education services tailored to traveller needs. The development therefore risks establishing a substandard living environment, in conflict with Policy H11.

#### **4. Environmental and open space considerations**

Land C27 has previously been identified as functional open space or incidental green space used by local residents. Its development would result in the loss of a valued community asset and green buffer between housing blocks, contrary to policy SC4 (open Space) and policy D1 (Design) in the Camden Local Plan.

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.

It is also an important Local Green Space /Open Space with mature trees and wildflowers. the green space has in the last few months been planted with several 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.

#### **5. Overconcentration and Lack of Integration**

There is no evidence that this site has been planned as part of a wider strategic approach to traveller accommodation, and the proposal risks becoming an isolated, poorly integrated development. Camden's policies emphasise inclusion and integration, not piecemeal or reactive development of unsuitable sites.

#### **6. 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.

#### **7. Flood Risk**

The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area).

#### **8. Lack of Consultation**

There has also been no consultation with local residents in relation to the proposed use of this site. It seems many residents, including of the Etons and Constable House, are still unaware of the proposals. I only became aware of the proposals a week before the deadline via a local Facebook group.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site. The proposal is also inconsistent with

other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems. One specific contradiction is the S106 requirement for open space which is part of the planning approval for the new site under construction at 5-17 Haverstock Hill.

### **Conclusion**

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

I strongly urge Camden Council to refuse this application and instead identify more suitable, sustainable sites through inclusive and evidence-based planning.

Please confirm receipt of this objection and keep me informed of any developments regarding this application.

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

Yours faithfully

Jemma Hollowell



Responder 498

Date: Fri, 27 Jun 2025 11:21:07 +0000

From: Leonie Oliva

To: PlanningPolicy

Subject: Regulation 19 Draft Local Plan Consultation - representations from  
Landsec

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[Redacted content]

[\[redacted email\]](#)

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

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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" value="Mrs"/>
First Name	<input type="text" value="Tim"/>	<input type="text" value="Hannah"/>
Last Name	<input type="text" value="Trillo"/>	<input type="text" value="Bryant"/>
Job Title (where relevant)	<input type="text"/>	[Redacted]
Organisation (where relevant)	<input type="text" value="Landsec"/>	
Address Line 1*	<input type="text" value="C/O Agent"/>	
Address Line 2	<input type="text"/>	
Post Town*	<input type="text"/>	
Post Code*	<input type="text"/>	
Telephone Number	<input type="text"/>	
E-mail Address	<input type="text"/>	

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

Name or Organisation: Landsec
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**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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Paragraph	N/A – refer to letter	Policy	N/A – refer to letter	Policies Map	N/A – refer to letter
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

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

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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 checked="" type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input checked="" type="checkbox"/>
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<p>Please see enclosed letter.</p> <p style="text-align: right;">(Continue on a separate sheet if necessary)</p>
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7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

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Please see enclosed letter.

(Continue on a separate sheet if necessary)

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No

Yes

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

N/A

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<b>11. Signature:</b>	Newmark	<b>Date:</b>	26 June 2025
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# Notes to accompany the Representation Form

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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***

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**Private & Confidential**

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

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

26 June 2025

Dear Sir, Madam

**O2 Masterplan Site, Finchley Road, London, NW3 6LU  
Regulation 19 Draft Local Plan Written Representations**

We are writing to submit written representations to the London Borough of Camden (LBC) Regulation 19 draft Local Plan in relation to the O2 Masterplan Site, Finchley Road, London, NW3 6LU (the Site).

These representations focus on the Regulation 19 draft Local Plan in so far as it relates to the O2 Masterplan Site and have been prepared to specifically consider the 'soundness' of the updated draft Local Plan, specifically considering if the draft Local Plan is:

- a) Positively prepared
- b) Justified
- c) Effective
- d) Consistent with national and regional policy

Landsec form part of London Property Alliance's Camden Working Group and Knowledge Quarter Liaison Group. Accordingly, Landsec support the comments made within the representations that have been submitted by the group unless where specifically noted within this letter.

**Background**

Landsec are the landowner of the Site. Planning permission (ref. 2022/0528/P) was granted for the redevelopment of the Site on 20 December 2023. The description of development for the permitted scheme is as follows:

**"Detailed planning permission for Development Plots N3-E, N4, and N5 and Outline planning permission for Development Plots N1, N2, N3, N6, N7, S1 and S8, including demolition of all existing structures and associated works, and redevelopment to include residential development (Class C3), commercial, business and service uses (Class E), local community uses (Class F2), and Sui Generis leisure uses (including cinema and drinking establishments) together with all landscaping, public**

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realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots, in accordance with the Development Specification.

**For the avoidance of doubt, the Detailed and Outline planning permission are separate and severable for each of the Plots shown on plan P011”.**

Landsec submitted a Section 73 (S73) application (ref. 2025/0484/P) in March 2025, seeking amendments to the approved scheme (ref. 2022/0528/P) and this application is currently pending determination by the LBC. The description of development for the S73 application is as follows:

**“Application under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary Conditions I4 (Severability Condition), AD1 (Approved Drawings - Masterplan), AD2 (Approved Drawings - Reserved Matters), AD3 (Approved Drawings - Phase 1), RM1 (Parameter Plans and Development Specification), RM6 (Phasing Plan), RM11 (Reserved Matters – Access Statement), RM21 (Reserved Matters – Total floorspace), D20 (Photo-voltaic Cells), D21 (Phase 1 Long Stay Cycle Parking), D22 (Phase 2 Short Stay Cycle Parking), D24 (Phase 1 Disabled Car Parking), D26 (Phase 1 Fire Safety Implementation of Approved Measures), and M28 (Phase-Wide Lighting Strategy) and the removal of Condition M7 (Major Utilities Infrastructure) of planning permission ref. 2022/0528/P dated 20 December 2023 for ‘Detailed planning permission for Development Plots N3-E, N4, and N5 and Outline planning permission for Development Plots N1, N2, N3, N6, N7, S1 and S8, including demolition of all existing structures and associated works, and redevelopment to include residential development (Class C3), commercial, business and service uses (Class E), local community uses (Class F2), and Sui Generis leisure uses (including cinema and drinking establishments) together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots, in accordance with the Development Specification. For the avoidance of doubt, the Detailed and Outline planning permission are separate and severable for each of the Plots shown on plan P011 and the description of development on any decision notice issued pursuant to the application would reflect that’, to allow for amendments to the Detailed Element (Plots N3-E, N4 and N5) including additional height, alterations to the design, massing and footprint of the buildings; the replacement of Block N4D with the relocated community centre; additional residential floorspace (and corresponding reduction in floorspace within Outline Elements); revisions to unit mix and internal layouts; additional community (Class F2) floorspace, reduction in retail (Class E,a) floorspace, reduction in professional services (Class E,c) floorspace, additional blue badge parking and cycle parking; revised landscaping and additional public realm; and associated works Planning permission has been granted for the entirety of the O2 Masterplan site which is split into three phases. Detailed planning permission is granted for the first phase of development and outline permission for the second and third phases, which will be subject to detailed reserved matters submissions once these parts of the scheme have been designed. Plot S8 which forms part of Phase 2 the O2 Masterplan proposal is the 14 Blackburn Road site which application ref. 2025/1685/P relates to”.**

The original permission and subsequent S73 application are hybrid i.e. part outline and part detailed. The construction of the scheme will be phased and built out over many years with Reserved Matters Applications required in relation to the outline elements. The emerging draft Local Plan will therefore be an important document in relation to decision making for any Reserved Matters and future applications on this Site.

Accordingly, there are a number of points which Landsec consider require clarification and/or amendment in order for the draft Local Plan to be considered ‘sound’ in accordance with paragraph 36 of the National Planning Policy Framework (NPPF). We deal with these points in relation to each of the Regulation 19 draft Local Plan chapters below.

## Chapter 1: Introduction

Landsec support the inclusion of the Site Allocations section (paragraphs 1.35-1.40) of the draft Local Plan, specifically that the indicative housing capacities identified for allocated sites are indicative and therefore not fixed figures that must be adhered to exactly and the flexibility that this affords allocated sites such as the O2 Masterplan.

## Chapter 2: Development Strategy

Landsec support the inclusion of the Site within paragraph 2.17 as a key area of growth and planned development within Camden.

In line with Landsec's comments on the Regulation 18 draft Local Plan, a new bullet point has been added to Policy DS1 identifying that the Council will expect development to meet the needs for new homes and jobs. Whilst this is welcomed, emphasis should be added to highlight that housing is the priority land use. Accordingly, this bullet point should be amended to read: **"Meeting the needs for new homes, the priority land use across the borough, and jobs"**. This would help the plan to be 'effective' in supporting the delivery of housing, a key strategic matter in determining soundness.

Landsec support the inclusion of the comprehensive and co-ordinated development section through the introduction of paragraphs 2.33-2.35 of the draft Local Plan, specifically the statement that *"piecemeal and uncoordinated development, where sites are taken forward in a fragmented or disjointed way, without a comprehensive plan, will be resisted"*. Indeed, the discussions between Landsec and the local planning authority during the processing of the approved scheme and associated Section 106 Agreement for the Site demonstrated that only a comprehensive approach can deliver the full range of potential public benefits associated with the regeneration of the area. The same level of placemaking, new homes, open space, community benefits and infrastructure funding would not be achieved by a series of piecemeal developments.

## Chapter 5: West Camden

Figures 14 and 15 of the draft Local Plan include the boundaries of the town centres. However, for the O2 Masterplan Site the town centre boundary is incorrect, only showing the O2 Centre and former Homebase (which has now been demolished) as falling in the town centre boundary when the Town Centre CPG shows the O2 Centre, the car park and the former Homebase within the boundary. Accordingly, these figures must be updated to reflect the correct town centre boundary shown within the Town Centre CPG. The identification of the O2 Masterplan Site as a **"key area of development"** on Figure 15 is supported and welcomed. Figure 16 shows the former Homebase as an existing building on the Site, but this has now been demolished and must be removed from the diagram. These updates will ensure that the draft Local Plan is accurate and therefore 'effective' in delivering upon the aspirations of the policies.

Part (C) of Policy W1 refers to the O2 Centre site as being **"the O2 centre, other retail uses, associated car parking and builder's merchant on Blackburn Road"**. However, part (D) of the policy only refers to the O2 Centre site. This should either be updated to state **"the site referred to in part (C) above ~~The O2 centre site~~ has the potential to become a vibrant and diverse new neighbourhood..."** or the entirety of the site description and its relevant parts included again so as to ensure there is no ambiguity about the land being referred to. Alternatively, a plan could be included. These updates will ensure that the draft Local Plan is accurate and therefore 'effective' in delivering upon the aspirations of the policies.

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The same point needs to be picked up in descriptions of the Site in parts J, L(6) and L(7) of draft Policy W1, where there needs to be an accurate description of each of the component parts of the draft Site Allocation W2, including 14 Blackburn Road which forms a key entrance to the consented masterplan scheme. This part of the Site is also required for the East-West link and to facilitate the delivery of Step Free Access to West Hampstead Station. These updates will ensure that the draft Local Plan is accurate and therefore 'effective' in delivering upon the aspirations of the policies.

Part (L) of draft Policy W1 identifies requirements associated with infrastructure from appropriate development. Reference should be made to directing Community Infrastructure Levy (CIL) receipts, towards some of the identified infrastructure priorities for the area. The wording should be amended as follows **"The Council will work with relevant providers and direct CIL receipts from local developments to secure the infrastructure needed to support development and provide the facilities needed for the area's communities"**. This will ensure that the draft policy is appropriately 'justified' in the context of the Community Infrastructure Levy Regulations 2010 which anticipate delivery of infrastructure from CIL receipts.

Draft Policy W1 part (L)(1) should be split out so that West Hampstead station and Finchley Road station are covered by separate bullet points. The wording should be amended to read:

- i. **Facilitation and contributions towards the delivery of new links / step free access into West Hampstead and Finchley Road Underground stations to improve access and capacity**
- ii. **Facilitation and contributions towards the delivery of new links / step free access into Finchley Road Underground station to improve access and capacity**

The S106 Agreement for the O2 Masterplan Site splits the contributions between the two stations and by including these as two separate parts, it is likely to be possible for Camden/TfL to secure additional funds from local developments, as two separate but important projects, to help facilitate the aspirations to improve access and capacity and to ensure that the draft Local Plan is 'effective'.

Whilst it is noted that bullet point 5 has been added to draft Policy W1 part (L) of the Infrastructure section, which relates to the interchange between the three West Hampstead stations, this should be more specific about the key priorities for the area, and the wording should be revised as follows **"improving the interchange experience both between the three West Hampstead stations and delivery of a strong, convenient, direct, safe and accessible pedestrian and cycling east-west route linking Finchley Road with West End Lane and providing safe and attractive linkages to the surrounding communities"**. This will ensure that the draft policy is 'effective' at delivering upon the aspirations for the Site identified within draft Site Allocation W2 and the West End Lane to Finchley Road SPD.

### **Allocation W2 – O2 Centre, car park, car showrooms and 14 Blackburn Road**

Landsec fully support the inclusion of the Site within the draft Local Plan as draft Site Allocation W2. However, there are a number of suggested amendments to this draft Site Allocation that are required in order to ensure soundness, as set out below:

#### Context

- A bullet point should be added at the beginning of the Context section which states **"The redevelopment and regeneration of the O2 Masterplan area is a one-off and unique opportunity. Fully accessible, brownfield sites, of this size are extremely rare"**. This will reinforce the NPPF position which gives substantial weight to the value of suitable brownfield land, proposals for

which should be approved unless substantial harm would be caused and will ensure that the draft policy is 'consistent with national policy'.

- It is noted that the previous text in the Context section regarding comprehensive, rather than piecemeal, development, has been removed and a new bullet point has been added about the extant planning permission and pending application at 14 Blackburn Road. Landsec strongly object to the replacement of this bullet point within the Context section (albeit noting that points 3 and 4 of the Development and Design Principles section do make reference to comprehensive/coordinated development) as the extant planning permission and live/future application(s) at 14 Blackburn Road are a significant threat to delivery of comprehensive and coordinated development of the Site and the ability to achieve Development and Design Principles 3 and 4. The fourth bullet point of the Context section should either be removed or amended as follows **"Whilst there is an extant planning permission for redevelopment at 14 Blackburn Road (PWX0202103) and a current application that proposes to amend the permitted scheme (2023/1145/P) this has the potential to undermine the ability to achieve the maximum regeneration benefits including the optimum approach to placemaking across the site, the quantum of new homes and affordable homes, and the delivery or funding of the requisite community and transport infrastructure, as set out in this policy and the West End Lane to Finchley Road Supplementary Planning Document"**. This change will ensure that the draft policy is 'effective' in securing the maximum regeneration benefits from this brownfield site, which will also be 'consistent with national and regional policy'.

### Development and Design Principles

- Point 2 of the Development and Design Principles section should be amended to remove reference to **"including a significant proportion of homes for families"**. Whilst provision of family housing is important, the wording already states that a mix of types, sizes and tenures should be provided, which would encompass family housing. Instead, reference should be made to the Dwelling Size Priorities table and up to date housing market assessment. This is a phased development with a long construction programme and the unit mix of later phases of the scheme will need to reflect the market demand that exists at the time. This will ensure that the draft policy is flexible over the plan period and therefore more likely to be 'effective'. Furthermore, the final sentence of point 2 should be amended as follows **"The applicant ~~will also be required to~~ should explore opportunities to deliver provision for older people or other people with care or support requirements"**, which reflects the fact that Camden have already granted planning permission for a scheme which does not include provision for older people or people with care/support requirements and is therefore not 'justified' in this case.
- It is noted that point 3 of the Development and Design Principles section acknowledges the West End Lane to Finchley Road SPD, the Fortune Green and West Hampstead Neighbourhood Plan and the extant planning permission for the O2 Masterplan Site, which Landsec support.
- Landsec welcome the inclusion of point 4 but it should also refer to the regeneration benefits that can be lost through piecemeal development to ensure that it is 'effective'. Accordingly, this point should be amended to read **"be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites, in order to achieve maximum regeneration benefits. The Council will resist piecemeal schemes that prejudice future development and design quality across the whole site and wider area, and especially where delivery would take place before necessary infrastructure is delivered"**.

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- Landsec consider that point 6 should also refer to town centre uses being focussed within the West Hampstead town centre (as well as Finchley Road / Swiss Cottage) to ensure that it is accurate and therefore 'effective'.
- Point 7 of the Development and Design Principles should be amended to read **"make provision for leisure uses on site, including a cinema. A cinema will be provided in line with market requirements"**. This is because the cinema market is changing rapidly and there is a need for policy to be flexible to reflect that there could be changes in consumer patterns and the policy is therefore more likely to be 'effective'.
- Point 8 of the Development and Design Principles section should be amended to read **"contribute towards the provision of new and/or improvement of existing, community facilities and services, including a health facility located near the West Hampstead interchange, to meet increased resident needs in accordance with Policy SC2 (social and community infrastructure). Phase 2 is considered the right location for the health facility because it is well located in relation to the bus routes and the West Hampstead interchange thus maximising accessibility from all modes of public transport"**. This will ensure that the draft policy accurately reflects the scheme that has already been approved and is therefore more likely to be 'effective'.
- Point 13 has been added to the Development and Design Principles section. Landsec support the enhancement of biodiversity and urban greening on-Site but note that an extra requirement has been added for development to contribute to the enhancement of the adjacent Site of Nature Conservation (SINC). The proposals for this Site are already heavily burdened with significant physical and financial contributions towards local area improvements and it is not appropriate to introduce a further financial burden on the development at this stage in the process. Camden have already granted planning permission for a scheme which does not contribute to the adjacent SINC and this is therefore not 'justified' in this case. Accordingly, point 13 must be amended to read **"enhance biodiversity on-site, contribute to the enhancement of the adjacent Site of Nature Conservation along the railway lines, and deliver urban greening measures on the site in accordance with Policy NE2 (Biodiversity)"**.
- A further bullet point should be added to the Development and Design Principles section as follows:

**(14) Provision of a strong, convenient and direct east-west route linking Finchley Road into West End Lane - this needs to be a generous, 24-hour, open, green, well overlooked and inclusive "street" - but not for vehicles**

This will ensure that the draft policy is 'effective' at delivering upon the aspirations for the Site identified within draft Site Allocation W2 and the West End Lane to Finchley Road SPD.

- The final paragraph of the Development and Design Principles section deals with building heights on the Site. Landsec support the identification of the Site as being a location where tall buildings may be an appropriate form of development. However, the reference to the height range identified in the Camden Building Heights Study, within the policy (9-54m), when the current and recently granted planning permission does not align with this, is not appropriate and is confusing. The policy should refer to the permitted scheme height only (33-61m), as this is what has been granted, and determined as appropriate through a townscape and heritage visual assessment, and what is likely to be built out on Site and is therefore 'justified' and 'effective'. It also provides clarity for anyone reading the plan. If a new planning application was to be made in the future, the scheme would be assessed against Policy D2, and the Camden Building Heights Study and previously approved scheme, would be material considerations. The text of this paragraph should be amended as

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follows: **“The Camden Building Heights Study has identified this site as a location where tall buildings may be an appropriate form of development, with 9m – 54m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies. The Council has granted planning permission for a development ranging in height from 33 - 61m. That decision was based on an assessment of the impacts and benefits of the specific development proposal, and it should not be assumed that the permitted heights would necessarily be appropriate for any subsequent development. For any alternative development proposals, the acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies”.**

### Infrastructure Requirements

- In accordance with Landsec’s comments on draft Policy W1 set out earlier in this letter, point 14 of the Infrastructure Requirements section should be amended so that West Hampstead station and Finchley Road station are covered by separate bullet points and the wording amended as follows:
  - o **Facilitate and contribute towards the delivery of new links / step free access into West Hampstead and Finchley Road underground stations and provide appropriate financial contributions to support access and capacity improvements at these stations**
  - o **Facilitate and contribute towards the delivery of new links / step free access into Finchley Road underground station and provide appropriate financial contributions to support access and capacity improvements at this station**

The S106 Agreement for the O2 Masterplan Site splits the contributions out between the stations and by including these as two separate parts, it is likely to be possible for Camden/TfL to secure additional funds from local developments to help facilitate the aspirations to improve access and capacity and to ensure that the draft Local Plan policy is ‘effective’.

### Other Considerations

- It is noted that an additional bullet point (4) has been added within the other considerations section, requiring proposals for substantial demolition to submit a pre-demolition audit in accordance with Policy CC2. This unnecessarily repeats policy requirements set out in the Responding to the Climate Emergency chapter of the draft Local Plan and should therefore be removed.

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

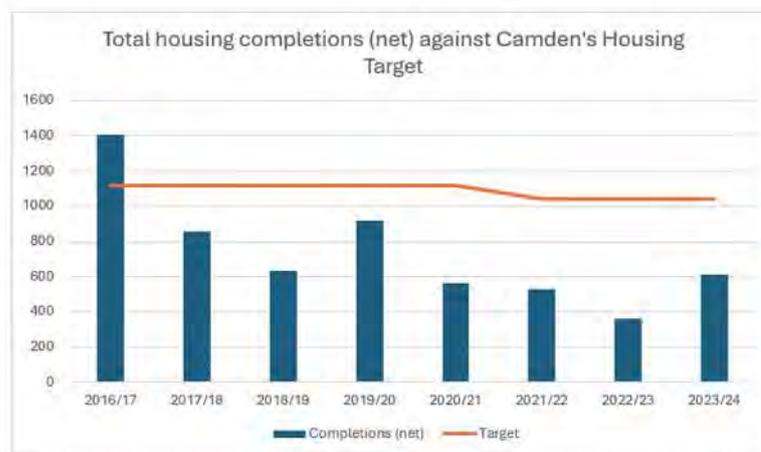
Paragraphs 7.7 and 7.8 of the draft Local Plan set out the Council’s housing targets and the need to maximise housing supply in Camden over the plan period. Landsec is pleased to be able to assist LBC in achieving its housing targets, with the O2 Masterplan Site providing approximately 16% of the draft Local Plan’s housing target of 11,550 homes over the plan period to 2041.

However, Landsec have very significant concerns about Camden’s approach to housing delivery and the proposed targets. The housing targets in the draft Local Plan are extremely unambitious, targeting 406 less homes annually than the adopted Local Plan, despite the national mandate to build significantly more homes to meet the Government’s target of building 1.5 million new homes by the end of the current parliament.

As is evident from the graph below, extracted from Camden’s Housing Delivery Test (HDT) Action Plan (November 2024), Camden have repeatedly failed to deliver against their annual housing targets since

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2016/17. The latest HDT results were published in December 2023 and show that only 1,981 new homes were delivered in Camden between 2019/20 and 2021/22 against a target of 2,891 new homes (a significant shortfall of 910 homes). This means Camden fails the HDT with a measurement of 69% when comparing the proportion of new homes delivered against the target, requiring Camden to produce an action plan and apply the presumption in favour of sustainable development as set out in the NPPF.



This graph shows the total number (net) dwellings completed between 2016/17 and 2023/24.

Source: London Borough of Camden Housing Delivery Test – Action Plan (November 2024)

This is against a backdrop of considerable need for housing and affordable housing within the borough. The consistent under delivery of housing (and also affordable housing) in Camden has a significant and negative impact on borough residents, resulting in homelessness and overcrowding, and negatively affecting the affordability of housing through lack of supply, forcing residents into rented accommodation or to move out of the borough entirely.

The Government's strategic objective is to deliver a wide choice of high-quality homes and create sustainable, inclusive and mixed communities. The Government published a revised NPPF in December 2024, alongside a response to the planning reform consultation and indicative local housing need figures using the Standard Method. The main objective of the new NPPF, and a key aspiration of the Labour Government, is to help unlock housing delivery in the UK.

The introduction of the new standard methodology for setting housing targets results in an overall increase across the country, to 370,000 homes per annum, accompanied by measures intended to increase the number of homes for which planning permission is granted. The standard methodology for setting housing targets increases Camden's requirement from 1,932 homes per annum under the previous standard method, to 3,137 homes per annum under the new standard method. This is a significant increase of an additional 1,205 homes per annum, with Camden barely achieving half of this increase over the past few years. This underperformance, coupled with significant need both at a national and local level, is not acknowledged anywhere within the draft Local Plan and this is a significant omission.

Instead, and illogically, Camden have sought to reduce the number of homes and affordable homes they are targeting to deliver over the plan period.

The adopted Camden Local Plan sets an annual housing target of 1,176 additional homes per year. The current London Plan sets an annual housing target for Camden of 1,038 additional homes per year

although it is currently being reviewed, and a new London Plan is due to be adopted by 2027, which is most likely to increase the housing targets for Camden in line with the national increases.

Notwithstanding this, the draft Local Plan only aims to deliver 770 homes per year over the Plan period (with associated reductions in affordable housing targets), which falls significantly short of both national targets and Camden's current housing target of 1,176 homes per year, despite there being an identified need for housing and an affordability challenge in the borough.

Furthermore, Camden have not sought to make-up the entire backlog of delivery in the early part of the plan period by increasing the targets for the first five years, nor have Camden added a buffer to the first five years, as required by the NPPF, as the trajectory indicates that this additional early delivery simply would not be achieved. This is contrary to paragraph 234 of the NPPF which states that for the purpose of preparing local plans, the policies in the NPPF (December 2024) will apply for any Regulation 19 plans post 12 March 2025.

The draft Local Plan is therefore entirely inconsistent with national policy in respect of housing delivery and targets, if adopted in its current form. There is a national housing crisis and clear direction from central Government to deliver more homes, and the London Plan expects borough housing trajectories to be ambitious.

Given the inevitability that the new London Plan will increase housing targets for Camden, and there is a national desire to deliver significantly more housing, Camden must be far more ambitious in setting housing targets and considerably more should be done now to identify where the additional capacity for housing will be achieved to deliver the housing that the borough desperately needs for its residents. The draft Plan should therefore be amended to ensure that the housing targets align with the standard methodology of the NPPF and that the plan is consistent with national policy.

The draft Local Plan, in its current form, is therefore not 'positively prepared' as the housing targets do not meet the area's objectively assessed needs.

Paragraph 7.11 defines what the Council consider to constitute self-contained housing, other than that which falls within Class C3. There is no acknowledgement within this paragraph of the important role that Class C2 housing for older people can have on housing delivery. Specialist older persons housing which falls within Class C2 is an important element of the suite of accommodation options which serves the ageing population in London, and this should be recognised by boroughs and applicants, as identified within the London Plan. When considering housing targets, Class C2 accommodation for older people would count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home, which is based on the amount of self-contained housing this form of supply will free up. Accordingly, an additional bullet point should be added beneath paragraph 7.9 to state "**Specialist older persons housing (Class C2)**" in order to be 'consistent with regional policy' (the London Plan).

New paragraphs 7.15 and 7.17 of the draft Local Plan acknowledge the market's inability to deliver the housing numbers envisaged within the Camden Local Plan 2017, recognising the need to consider diversity in housing supply, some of which is not self-contained, to maximise delivery. Landsec specifically support the mention of Build to Rent (BtR) and housing for people with care or support requirements (such as older people).

A new paragraph 7.31 has been added to the draft Local Plan which relates to optimising sites to deliver housing. It notes that 405 dwellings per hectare is an appropriate density for "**higher public transport accessibility areas**", with the town centre of Finchley Road / Swiss Cottage specifically noted as one of

these areas. However, this is based on the Sustainable Residential Quality density matrix in the London Plan 2016 which is now significantly out of date and therefore inappropriate to apply in order to determine appropriate levels of density. Indeed, the Housing Density Topic Paper which informed the current London Plan noted that the majority of approved developments in London had, at the time, exceeded these densities. In order to ensure site optimisation, this part of the paragraph should be removed so it is clear that appropriate densities are to be determined based on a design-led approach which takes account of site specific circumstances. Accordingly, this paragraph should be amended as follows **“When considering the optimum number of homes, the Council will have regard to all relevant policies and guidance, particularly those related to design and heritage, such as policies addressing conservation areas, the appropriateness of tall buildings, mobility difficulties and accessibility, and applicable space standards. We will also consider the accessibility of the site by public transport and the density of housing in the immediate context. ~~Taking account of the Sustainable Residential Quality density matrix in the London Plan 2016, the Camden Local Plan 2017 indicated that densities of new self-contained homes should generally be between 45 dwellings per hectare (in areas of existing low density or lower public transport accessibility) and 405 dwellings per hectare (in areas of existing high density or higher public transport accessibility). This range continues to be appropriate as a broad guideline, but the Council recognises that lower or higher densities may be justified in some contexts”~~**.

Draft Policy H4 (Maximising the supply of affordable housing) sets out that the Council will aim to maximise the supply of affordable housing to meet or exceed a borough wide delivery target of 3,000 additional affordable homes over the plan period. Whilst Landsec is pleased to be able to assist LBC in achieving this target, this target should also be reviewed in light of the more ambitious approach that must be taken to overall housing numbers.

Draft Policy H4 notes that the Council support the London Plan’s strategic target of 50% of London’s new homes to be genuinely affordable. Camden’s Whole Plan Viability Assessment (April 2025), which forms part of the evidence base of the draft Local Plan, specifically notes within the conclusions and recommendations that they **“have appraised residential schemes with a range of affordable housing from 0% to 50% to test the ability of development typologies to meet the requirements of draft Policy H4”**. It then goes on to state that **“although a number of the development scenarios tested could viably support the full strategic affordable housing policy target, our appraisals indicate that there are significant variations in the percentages of affordable housing that can be provided”**.

Landsec strongly object to the retention of a strategic 50% affordable housing target as it inappropriately sets expectations for a level of affordable housing delivery which, in almost all cases, is not achievable in the current market. This point is acknowledged in the Whole Plan Viability Assessment which specifically identifies that there are significant variations in the percentages of affordable housing achievable. Given the widespread challenges facing housing and affordable housing delivery in London, the GLA are considering as part of the new London Plan whether the threshold approach to affordable housing needs to be reviewed, and this is an opportune moment for Camden to consider whether they need to do the same to incentivise housing development and help unlock housing delivery in the borough. It is entirely pointless to adopt an overly aspirational policy target which applicants are unable to achieve. The percentage of affordable housing sought as part of housing schemes should be set at a lower, and more appropriate, level to manage expectations and to reflect the challenges facing the market in order for the draft Local Plan to be considered ‘justified’ in the context of its evidence base.

Draft Policy H4 part (D) has been amended to state **“where a development of build to rent housing...is proposed, we will apply the distinctive affordable housing provisions of the London Plan for the relevant housing type but as an alternative will strongly encourage contributions of self-contained affordable housing on these development sites”**. Whilst Landsec support the reference to the

provisions of the London Plan, this part of draft Policy H4 should be removed to ensure that the draft policy is 'consistent with regional policy' (the London Plan) which allows the affordable housing element of a BtR scheme to be delivered as Discounted Market Rent (DMR). This allows BtR schemes to meet their affordable housing requirements while recognising the different economic model of a BtR scheme and not unduly impacting viability, which will support deliverability of housing schemes which are critical to assist Camden in meeting their housing targets.

Landsec support the reference within paragraph 7.119 that **“for developments that must be referred to the Mayor under the provisions of the relevant legislation, the proportion of habitable rooms in each tenure will be the primary consideration”** as this is 'consistent with regional policy' and aligns with the London Plan.

It is noted that a new paragraph 7.120 has been added which states that the viability thresholds of the London Plan may be amended and Camden will apply the latest thresholds to be formally approved. Landsec support this position which provides for flexibility in the event of the London Plan position changing. However, Camden should be bolder and take their own initiative in determining appropriate thresholds to help incentivise and unlock housing delivery.

The support at paragraph 7.123 for innovative intermediate housing products that can be made affordable to a wider range of groups in Camden is acknowledged. However, it is noted that Shared Ownership is not accepted by LBC as an appropriate intermediate housing product due to the difficulty of meeting the income thresholds set out in the London Plan. This is not appropriate as it does not reflect London Plan Policy H6 (Affordable housing tenure) which includes London Shared Ownership as an acceptable intermediate product. If it was possible to show that Shared Ownership could be provided at a level that does meet the London Plan income thresholds, i.e. affordable to households on incomes of up to £90,000 and under the open market value of £600,000; then this should be considered acceptable on a site-by-site basis and made explicit within LBC's Local Plan to ensure that it is 'consistent with regional policy' (the London Plan). This would then align with the GLA's approach to grant funding applications, which supports shared ownership. A greater level of flexibility in relation to affordable housing products, on a site-by-site basis, which is aligned with the GLA's approach, is likely to improve and increase delivery of affordable housing, particularly when this can be supported by grant funding.

A new paragraph 7.145 has been added noting that notwithstanding the London Plan provisions for affordable housing from BtR, student accommodation and co-living, due to Camden's shortfall, they will **“strongly encourage contributions of self-contained affordable housing on-site”** in accordance with their preferred tenure mix to come forward as part of these developments. As set out earlier in this letter, the draft Local Plan should be 'consistent with regional policy' and aligned with the London Plan which allows the affordable housing element of a BtR scheme to be delivered as Discounted Market Rent (DMR) as opposed to self-contained affordable housing. This allows BtR schemes to meet their affordable housing requirements while recognising the different economic model of a BtR scheme and not unduly impacting viability, which will support deliverability of housing schemes which are critical to assist Camden in meeting their housing targets. Furthermore, consistency with regional policy, generally, helps to provide clarity which in turn assists the speed of delivery.

The Regulation 19 draft Local Plan retains the new section on BtR (paragraphs 7.184 – 7.188). The inclusion of this section and the Council's support and acknowledgment that BtR could potentially help to increase overall housing output in Camden is welcomed and supported by Landsec. The provision of good quality rented accommodation providing opportunities for longer tenancies and well managed accommodation will form an important addition to housing stock in Camden for individuals, couples and families. In particular, there is a lack of suitable accommodation for households who cannot afford

to buy but do not meet affordable housing criteria. This sector includes many important service providers such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers, and the O2 Masterplan scheme has been developed specifically to provide options for this group. It is important that the housing stock across Camden provides a full range of accommodation options including rented, market housing for sale, and new and emerging housing formats. Paragraph 7.186 states that, with regards to BtR, the Council will be flexible in the application of affordable housing and dwelling size policies to development of BtR housing where they consider such housing will help to create mixed, inclusive, and sustainable communities. This flexibility is supported.

Paragraphs 7.187 and 7.188 deal with the affordable housing associated with BtR schemes. As set out earlier in this letter, in order to be 'consistent with regional policy' / in accordance with London Plan policy, the draft Local Plan should be clear that BtR schemes can provide the affordable element as DMR. Accordingly, the paragraphs should be amended as follows:

**"7.187. As indicated in association with Policy H4, the London Plan provides for the affordable housing contribution from build to rent housing to take the form of homes for Discount Market Rent. The London Plan seeks the provision of homes for Discount Market Rent in the form of a specific intermediate housing product known as London Living Rent, and aims for at least 30% of the homes for Discount Market Rent to be let at London Living Rents. The Council will apply the distinctive affordable housing provisions of the London Plan, including the provisions for homes for Discount Market Rent, but will still allow As set out in the paragraph above and in Policy H4 Part D, the Council strongly encourage an affordable housing contribution from build to rent housing in accordance with the guideline mix of low-cost rented housing and intermediate housing, but as an alternative will apply the distinctive affordable housing provisions of the London Plan, including the provisions for homes for Discount Market Rent."**

**"7.188. Where a developer ~~opts to provide~~ provides affordable housing in the form of homes for Discount Market Rent and London Living Rent, in accordance with the London Plan, the Council will expect the homes for London Living Rent to be made available to households on our Intermediate Housing Register of Interest, in accordance with the Council's Intermediate Housing Strategy. The Council may also seek to negotiate nominations to a proportion of the homes for London Living Rent. Nominations would be of single people or households with an acknowledged housing need, potentially including people accepted by the Council as homeless, people in temporary accommodation and care-experienced young adults"**.

Landsec welcome and support the updates made to Table 9: Dwelling Size Priorities in accordance with their comments on the Regulation 18 draft Local Plan.

Paragraph 7.214 notes that where the characteristics of a development make it impractical to achieve a mix of large and small homes amongst both the affordable housing and market housing, consideration can be given to amending the mix to provide low-cost rented housing for larger homes and market housing in the form of small homes. Whilst this is welcomed and supported, the wording **"where viable and supported by a Registered Provider for the low-cost rented element"** should be added to the end of the sentence to ensure that the application and implementation of the policy is 'effective'.

Draft Policy H9(B)(1) states that the Council will seek a supply of student housing to meet or exceed Camden's target of 200 additional places in student housing per year and will support the development of student housing provided that the development **"will not involve a disproportionate loss of self-contained homes (particularly homes with three bedrooms), having regard to the overall addition to housing supply"**. Landsec object to the word **"disproportionate"** in this part of the policy. The inclusion

## Landsec

of the word “**disproportionate**” in the sentence is directly contradictory to draft Policy H3 which protects existing residential floorspace. The word “**disproportionate**” should therefore be removed to ensure consistency between draft Local Plan policies and ‘effective’ implementation of such policies.

It is noted that the Regulation 18 version of the draft Local Plan Policy H9 previously noted that student housing development should “**not create a harmful concentration of such a use in the local area**”. However, this wording has been removed from the Regulation 19 draft Local Plan and this should be added back in to point 9 to ensure that the additional flexibility introduced within the draft Local Plan for PBSA development does not result in over concentrations of such uses across the Borough. Accordingly, draft Policy H9(B)(9) should be amended to read “**will not create a harmful concentration of such a use in the local area and will protects residential amenity in accordance with Policy A1**”.

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

Whilst Landsec fully recognise the climate emergency and support the overarching aspirations relating to climate change in the draft Local Plan, the draft policies contained within this chapter are incredibly detailed and would be more appropriate as part of a new/updated Supplementary Planning Document rather than included within the Local Plan itself.

It respect of all other comments on this chapter, Landsec are aligned with the Camden Working Group and Knowledge Quarter Liaison Group’s representations.

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

Draft Policy SC3 (Social and Community Infrastructure) sets out that the Council will work with its partners to ensure that social and community infrastructure is developed and modernised. Landsec welcomes the principles of the policy and the improvements to social and community facilities generally. However, whilst part (C)(8) of the draft policy identifies that funding will be important, it does not go as far as acknowledging the difficulties associated with funding social and community infrastructure. This should be taken into consideration when determining whether the provision of social and community facilities is appropriate to ensure the ‘effective’ implementation of the policy.

Draft Policy SC5 (Food Growing) states that the Council will seek to secure the on-site provision of suitable space for food growing by residents as part of all major housing and mixed-use developments incorporating housing. Where provision cannot be made on-site, a financial contribution will be sought to deliver off-site community food growing projects. The supporting text at paragraph 10.89 also states that “**this will be sought as part of the overall open space requirement generated by a development in accordance with Policy SC4 (Open Space)**” and this is welcomed and supported by Landsec as it directly responds to their previous representations on this point.

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

Draft Policy D1 (Achieving Design Excellence) sets out that all development in Camden must achieve excellence in the architecture and design of buildings and places. Landsec fully supports Camden’s position on design excellence and considers that this can be best achieved on large schemes by engaging a masterplan architect, and a number of different plot architects, through the initial design process to test parameters and develop robust design codes. Landsec also share Camden’s values on the importance of provision of open space with a high-quality landscape design.

Paragraphs 12.21-12.23 of the draft Local Plan acknowledge the importance of community engagement within the design and planning application process. Landsec supports this position and is in full

## Landsec

agreement with the draft Plan in terms of the importance of community engagement and outreach, which is reflected in their community engagement on the proposals for the O2 Masterplan Site.

Draft Policy D2 (Tall Buildings) and Table 12 define locations where tall buildings may be an appropriate form of development within the Borough and Figure 22 identifies specific locations in Camden where tall buildings may be an appropriate form of development. Landsec support the identification of the Site (within Table 12 and Figure 22), as a location where tall buildings may be an appropriate form of development.

Draft Policy D3 part A (3), states that **“the Council will expect all new homes to be dual aspect”**. While Landsec supports the aspiration for all homes to be dual aspect, it must be acknowledged that many high-quality developments do contain some single aspect homes, and these can provide a high-quality living environment. A small proportion of single aspect homes may be necessary in order to address specific on-site design considerations, or in order to optimise site capacity, which is an important consideration in addressing the national housing shortage. This is supported by the GLA’s Accelerating Housing Delivery Practice Note (December 2024), which notes that the Housing Design Standards LPG **“should not be applied mechanistically in a way that inhibits delivery. It should be applied in the context of the need to optimise site capacity”**. It then goes on to specifically emphasise that whilst standard C4.1 aims for new homes to be dual aspect it is recognised that an **“appropriate and efficient design solution may involve some dual aspect units. While the amount of single aspect units should be kept to a minimum, this will vary according to the specifics of each site, the design rationale for their use and the impact on key objectives”**. Accordingly, this part of draft Policy D3 should be removed or alternatively amended to read **“the Council will ~~expect all~~ support and encourage new homes to be dual aspect whilst ensuring site optimisation”**.

### Chapter 14: Safe, Health and Sustainable Transport

Draft Policy T1 introduces an additional bullet point (A) (11) which seeks contributions towards enhancing the existing transport network from development that increases the demand to travel, where appropriate, to improve and increase opportunities for active and sustainable travel. New paragraphs 14.13-14.17 are also introduced providing further detail on where financial contributions towards transport improvement schemes will be secured. Landsec object to the introduction of this within the policy wording as improvements to transport infrastructure as a result of development should be funded by CIL contributions. Accordingly, this point should be removed from the policy wording. This would ensure that the draft policy is appropriately ‘justified’ in the context of the CIL Regulations 2010 which anticipate delivery of transport infrastructure from CIL receipts.

### Chapter 15: Delivery and Monitoring

Draft Policy DM1 part (A)(1) states that the Council will work with a range of partners to ensure that opportunities for delivering healthy and sustainable developments that maximise community benefit are fully explored. Paragraph 15.33 has been updated to include landowners as a partner in the borough that the Council will work with, in delivering the objectives of the draft Local Plan and this is welcomed and supported.

At paragraphs 15.34-15.36, there is acknowledgement that the Local Plan needs to be flexible enough to ensure that the Council’s vision and objectives for Camden can be delivered in future years despite changing circumstances. It states that there is a need for sensitive and flexible implementation which is welcomed.

## Conclusion

Overall, Landsec find that **the draft Camden Local Plan is unsound** because a number of the policies require refinement to ensure that they are 'positively prepared', 'justified', 'effective' and 'consistent with national and regional policy', as set out in this letter.

Furthermore, Landsec note that there are a significant number of competing policy objectives within the draft Local Plan. It is important that these competing policy objectives are considered, in relation to specific development proposals on a site-by-site basis, to ensure that the best possible solutions are delivered and development is not unduly burdened. Accordingly, the competing requirements of the policies in relation to development proposals should be viewed flexibly and in a pragmatic way.

If the proposed changes suggested within this letter are taken forward, Landsec would find the draft Camden Local Plan to be 'sound' in accordance with the NPPF.

We would appreciate acknowledgement of the receipt of these comments, on behalf of our client Landsec, as part of the ongoing consultation on the draft Local Plan, which runs until Friday 27 June 2024.

In the meantime, if you have any queries regarding the content of this letter, please do not hesitate to contact Landsec's planning agents, at Newmark, [REDACTED]

[REDACTED]

Yours faithfully

Tim Trillo

[REDACTED]

[REDACTED]

Responder 499

Date: Fri, 27 Jun 2025 11:21:40 +0000  
From: Beth Roberts  
To: PlanningPolicy  
Subject: Tarmac Trading Limited Response to the Camden Proposed Submission Draft Consultation

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Please see the attached documents for Tarmac's representation to the Camden Local Plan Proposed Submission Draft consultation. The attached representation letter should be considered as Tarmac's full response to this consultation.

If you are able to confirm receipt of this email, that would be appreciated.

Kind regards,

Beth

**Beth Roberts**



# Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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

This form has two parts –

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

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

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

## Part A – Submit only one copy of this

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Alan"/>	<input type="text" value="Bethany"/>
Last Name	<input type="text" value="Everard"/>	<input type="text" value="Roberts"/>
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**

<b>Name or Organisation:</b> Tarmac Trading Limited
---

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

Documents can be found at the following links:

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

Paragraph  Policy  Policies Map

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

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

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

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

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

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

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

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

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

<p>Please refer to the attached letter which details Tarmac’s full response to this consultation.</p>
---

(Continue on a separate sheet if necessary)

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

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

Please refer to the attached letter which details Tarmac's full response to this consultation.

(Continue on a separate sheet if necessary)

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

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

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

No

Yes

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

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

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

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

**Privacy Notice**

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

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

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

**11. Signature:**

**Date:**

**27/07/2025**

# 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.

**Planning Policy Team**

Camden Council  
5 Pancras Square  
London  
N1C 4AG

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

Dear Sir / Madam,

**RE: Regulation 19 Consultation on the Draft New Local Plan for Camden Council – Representations on Behalf of Tarmac Trading Limited.**

This letter has been prepared by Heatons on behalf of our client Tarmac Trading Limited (hereafter referred to as 'Tarmac') as a formal representation to the above consultation, which closes on the 27<sup>th</sup> June 2025.

Tarmac operates a concrete batching plant at Kings Cross, the plant forms part of a site that is vital for the importation and manufacture of construction materials in central London.

The purpose of this letter is to ensure that adequate mineral safeguarding policies are set out in the New Local Plan and maintained throughout the Plan period, as per national planning policy. Tarmac also wish to set out the importance of the King's Cross operations and to ensure that its safeguarded status is accurately reflected within the emerging Local Plan, especially in regard to Allocation S20.

Tarmac's Kings Cross Plant

Tarmac's Kings Cross Plant ('the Site') has been operational since 2004 and is situated within an industrial area which has a longstanding history associated with the import and supply of aggregates and building materials by rail, as well as the production of ready mixed concrete. The Site consists of a concrete batching plant and aggregate storage building, with conveyors which feed the plant from the rail siding.

Heatons



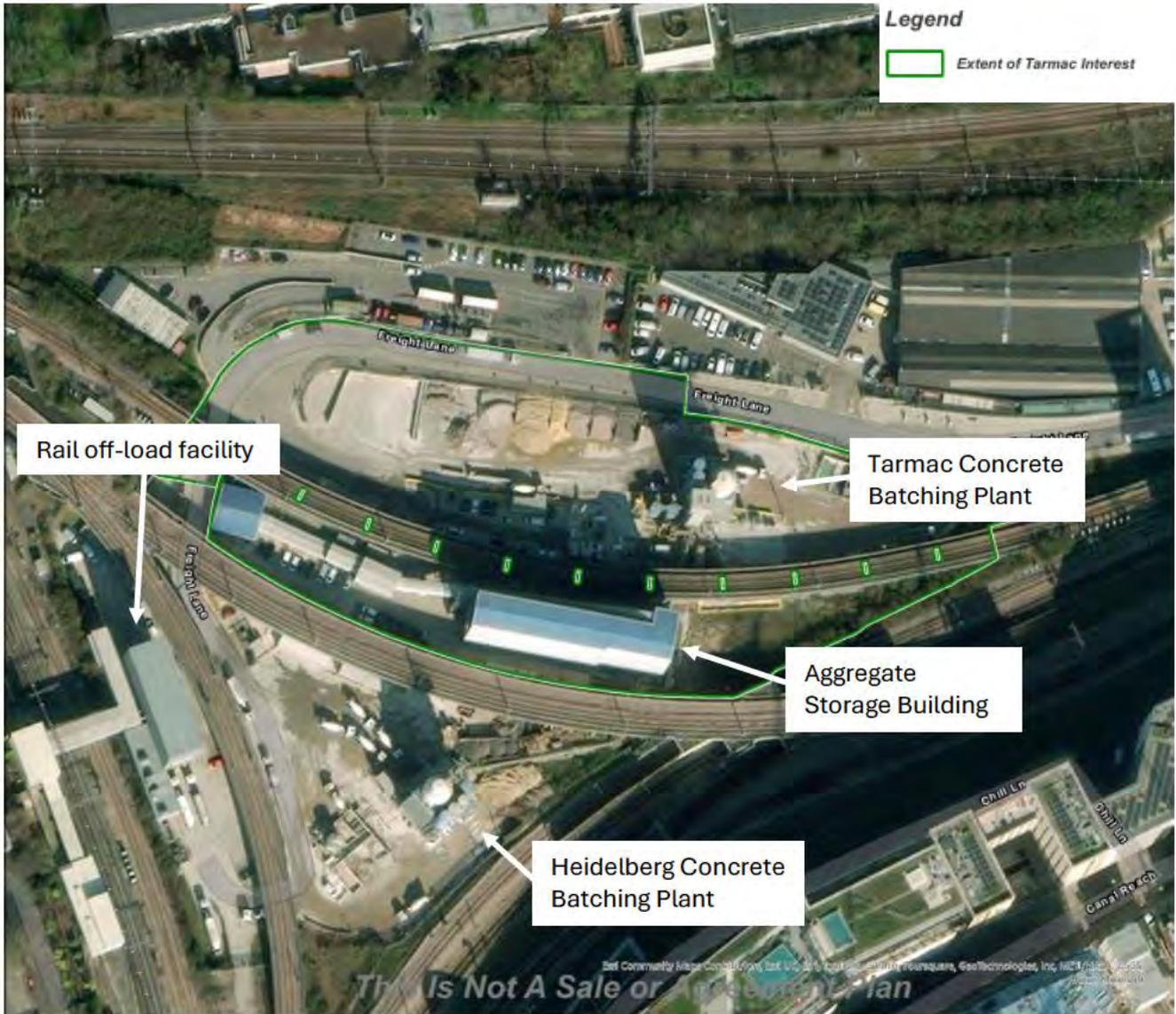


Figure 1: Site location and layout (2025)

The Site is approximately 500m north of St Pancras and Kings Cross railway stations, with an existing rail siding and offload facility 50m southwest of the Site. The Plant imports aggregate from the sidings using conveyor. In addition to this, Heidelberg Materials operate a concrete batching plant immediately south of Tarmac’s plant which also utilises the aggregate storage and conveyor infrastructure available within the wider site. These plant sites are strategically located for supplying concrete products to construction sites across central London and its use is vital for the construction industry within Greater London.

The extant permission of the Tarmac Site is 2004/5361/P, with Condition 6 of the permission restricting operations between 22:00-06:00 except for 30 days a year, where the facility can operate on a 24-hour basis to allow for aggregate received from nighttime freight trains to be conveyed into the storage facilities.

## Planning Policy and Guidance Context

### *Camden Local Plan 2017*

Tarmac's Kings Cross Concrete Batching Plant (and associated aggregate storage bays) are not safeguarded within the adopted Camden Local Plan (2017). However, the adjacent rail off-load facility, aggregate storage building and Heidelberg's Concrete Batching Plant are all identified as an 'Aggregate Safeguarding Site'. There is no specific adopted policy defining this status, however the accompanying text for Policy T4 *Sustainable Movement of Goods and Materials* states:

*'The Council will seek to protect track side freight processing sites such as the existing aggregate handling facility at King's Cross' (Paragraph 10.32 of the Camden Local Plan (2017))'*

Furthermore, the Site is identified as being within the Kings Cross 'Local Plan Growth Area' in the adopted Site Allocations Plan (2013). This sets out the aim for a 'comprehensive and phased mixed-use development of former railway lands.'

### *The London Plan 2019 – 2041 (2021)*

The London Plan was adopted in March 2021 and forms part of the Development Plan for all of London's Local Planning Authorities. The London Plan emphasises the need for a reliable supply of construction materials to support continued development needs (Para 9.10.1). The London Plan also highlights the important role Mineral Planning Authorities (MPA) play in identifying and safeguarding existing, planned and potential sites for aggregate transportation, processing and manufacture. Adopted Policy SI 10 '*Aggregates*' states that in their local plans all MPAs should:

- 1) identify mineral safeguarding areas to protect sand and gravel resources from development that would otherwise sterilise future potential extraction; and
- 2) identify and safeguard sites and facilities, including wharves and railheads, with existing, planned or potential capacity for transportation, distribution, processing and/or production of primary and/or secondary/ recycled aggregates.

Adopted Policy D13 '*Agent of Change*' places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Policy D13 adds that Boroughs should ensure their Development Plans reflect the Agent of Change principle and development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow

without unreasonable restrictions being placed on them.

The London Plan underwent early engagement public consultation until the 22<sup>nd</sup> June 2025 to help inform a New London Plan. This consultation focuses on high-level options for meeting housing need and affordable housing thresholds as well as the strategy for industrial land and the role of opportunity areas. The 'Towards a New London Plan' consultation document sets out that the New London Plan needs to plan for 880,000 homes over ten years' across Greater London. By comparison the current adopted London Plan has a 10-year target for net housing completions of 522,870.

#### *National Planning Policy Framework (2024)*

Section 17 of the National Planning Policy Framework (NPPF) relates to 'Facilitating the sustainable use of minerals'. Paragraph 222 confirms it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.

Paragraph 223 states that planning policies should, among other things, safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.

Paragraph 225 affirms that local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working. This 'agent of change' principle is also referenced at Paragraph 200 to ensure new development is integrated effectively with existing businesses and those businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

#### *Planning Practice Guidance for Minerals –*

Planning Practice Guidance (PPG) states that planning authorities should safeguard existing, planned and potential storage, handling and transport sites to:

- ensure that sites for these purposes are available should they be needed; and
- prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes (Paragraph 006).

*Tarmac's Comments on Safeguarding Policy*

The Proposed Submission Draft of the Camden Local Plan (April 2025) sets out the Council's vision for future development in Camden and includes planning policies and site allocations. Once adopted, it will supersede the current Camden Local Plan (2017) and the Camden Site Allocations Plan (2013).

The Policy Map of the Proposed Submission Draft now illustrates Tarmac's Kings Cross Concrete Plant as being included within an Aggregate Safeguarding Area. The inclusion of Tarmac's Plant within the safeguarded area aligns to guidance within the NPPF, as it is now recognised as important/essential mineral infrastructure. Tarmac are pleased to see that this has been correctly updated and now aligns with national policy and the safeguarded status of the adjacent Heidelberg Concrete Plant, rail off-load and aggregate storage facilities.

Reference is first made to the Kings Cross Concrete Plant in the Proposed Submission Draft at Policy S1(Q) *South Camden*, which states that 'the Council will continue to protect the concrete plant at Kings Cross, which is designated as an Aggregate Safeguarding Area on the Local Plan Policies Map'. As established previously within this representation letter, there are two concrete plants located at Kings Cross, one ran by Tarmac and the other ran by Heidelberg Materials. Therefore, the statement should read as 'the Council will continue to protect the concrete plants at Kings Cross ...', to ensure that it is clear that both Concrete Plants at Kings Cross are protected within the Aggregate Safeguarding Area.

Whilst Tarmac supports the Plant's inclusion within an Aggregate Safeguarding Area, there is no definition within the emerging Plan of said safeguarded status, or any criteria that any development within or adjacent to an Aggregate Safeguarding Area should follow. As there is no actual policy within the emerging Local Plan that sets out the definition or importance of Aggregate Safeguarding Areas, it creates an uncertainty for existing sites/operators that consideration of potential effects on existing operations is not being duly considered should applications come forward on adjacent land. In addition, uncertainty for those bringing applications forward on land next to safeguarded areas on the implications/tests by which applications would be assessed. This presents a potential for inappropriate development within or adjacent to Aggregate Safeguarding Areas. Therefore, without a clear policy direction of what an Aggregate Safeguarding Area is, it does not appropriately protect these important sites.

The Agent of Change principle is referred to in Policy IE3 *Industry*, which avoids non-employment uses from affecting the operation of existing businesses, in line with the London Plan and national policy. The inclusion of the Agent of Change principle within the emerging Local Plan is supported by Tarmac. However, as aforementioned there is no definition of an Aggregate Safeguarding Area. Tarmac would welcome the Agent of Change principle to be included when referring to mineral processing/transfer facilities to ensure that sites are adequately protected in line with national policy. It is crucial that operations at mineral infrastructure sites are appropriately

safeguarded, as the aggregates produced are vital for the construction industry, which is especially important to meet the growing housing needs of London.

Policy T6 *Sustainable Movement of Goods, Services and Materials* also sets out Camden's aim to promote the sustainable movement of goods by minimising road movement. This policy is supported by Tarmac as it seeks to 'protect existing facilities for waterborne and rail freight traffic' and references the Kings Cross rail aggregate handling facility in the policy sub-text paragraphs, therefore recognising the importance of these facilities.

Given the emerging New London Plan's need to supply 880,000 homes over a 10-year period, and Camden's target of 11,550 within a 15-year period, Tarmac's Kings Cross Plant is strategically located close to existing rail facilities and construction markets and is appropriately situated to meet the demand for construction materials. Tarmac considers that rail-linked sites, such as the Kings Cross Plant should have greater emphasis on its importance written within the policy text, as they are a key component in supplying aggregates to meet the ambitious development targets within Camden and London as a whole.

Overall, Tarmac support the inclusion of their Kings Cross Plant within the Aggregate Safeguarding Area and also support the inclusion of the Agent of Change principle. However, to ensure that the Concrete Plant is adequately protected, it is vital that the term 'Aggregate Safeguarding Area' is defined within policy, with a set criterion to ensure that sites within these areas are adequately safeguarded.

#### *Tarmac's Comments on Allocation S20*

Allocation S20 *York Way Depot and adjacent land at Freight Lane* is a draft allocation area of 1.05 hectares and allocates a use of 210 permanent self-contained homes, employment, depot and bus operations/parking facility and accommodation for gypsies and traveller on land directly north of Tarmac's Kings Cross Plant.

The current use of the allocated site is a Council Depot with offices, vehicle parking and maintenance facilities and the rest is largely open land, that formerly accommodated bus parking and ancillary staff facilities. Its current use is compatible with the operations at the Tarmac's Plant as it is not considered sensitive development.

Figure 2 below illustrates the location of Tarmac's Kings Cross Plant in relation to the Allocation S20.

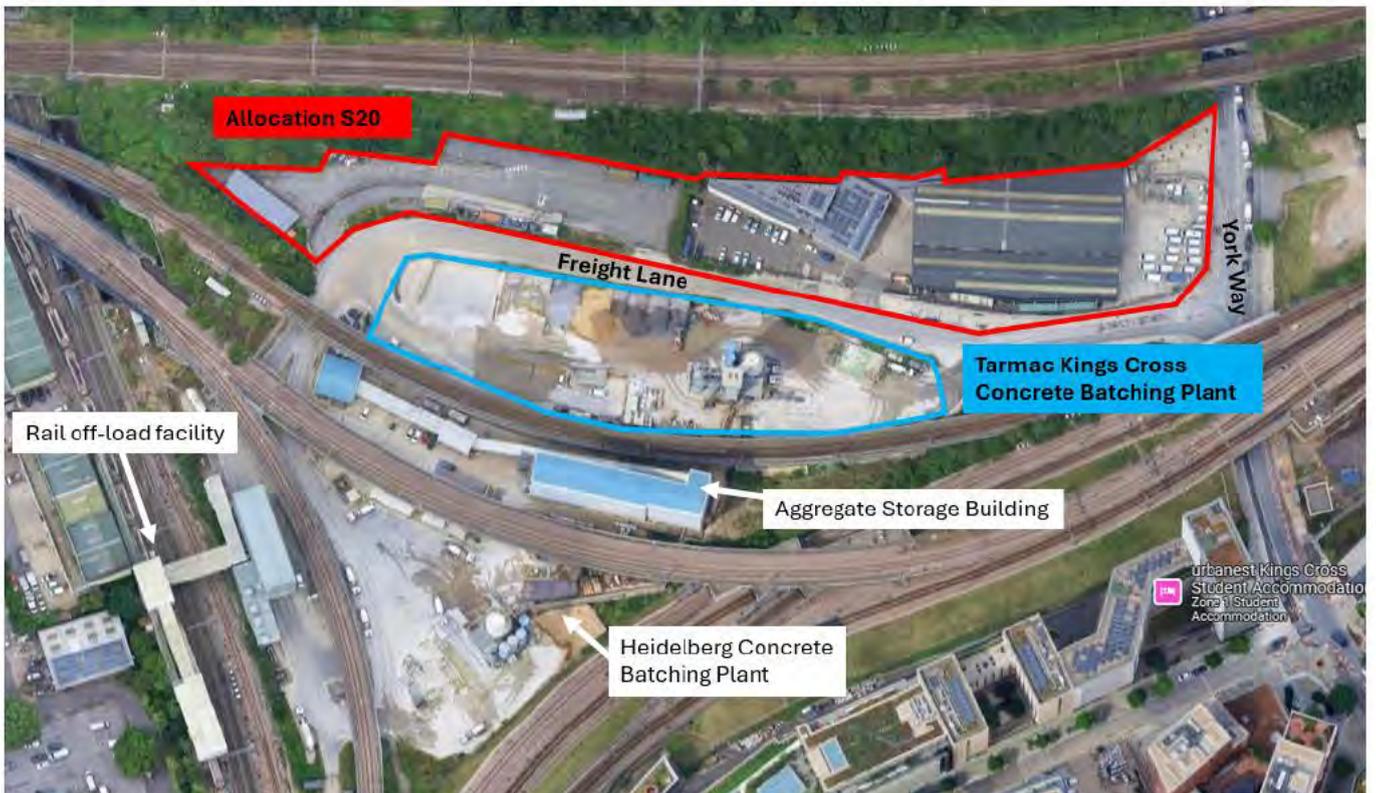


Figure 2: Site location and layout (Google Maps, 2025)

Table 5 within the Site Selection Topic Paper prepared in support of the Proposed Submission Draft Plan (April 2025) indicates that this is a new site allocation submitted at Regulation 18 stage and has been added to the Proposed Submission Draft Plan. Appendix 1 of the Topic Paper assesses the suitability, availability and achievability of sites.

The assessment considers the Allocation Site to be suitable as it is a brownfield site, is located in an area with a high Index of Multiple Deprivation score; and has good accessibility. The assessment identifies multiple constraints with the Site, the two of relevance to the content of this letter and Tarmac's interests relate to the Allocation Site being 'nearby an Aggregate Safeguarding Site' and 'Noise'. The next paragraphs will individually assess the Council's response to the constraints and provide Tarmac's comments on the matters.

#### Council's Policy Solution

The Council's solution to ensuring that the operations at the Aggregate Safeguarding Site are protected, including those at Tarmac's Plant, is to:

*'6. ensure that the design and layout of the scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the Agent of Change principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);*

12. *be designed and located so as not to prejudice the continued operation of the aggregates transshipment facility which straddles the railway immediately south of this site.'*

### **Tarmac's Comments**

Firstly, there is no mention within the S20 Allocation Policy protecting the aggregate handling and processing site including Tarmac's Concrete Plant, which is directly adjacent to the Allocation Site and therefore will have the most impact on any potential sensitive development. Furthermore, the Policy does not mention or set out how it will protect the status of the Aggregate Safeguarding Area.

Paragraph 223 of the NPPF (2024) and the Minerals Planning Practice Guidance emphasises the importance of safeguarding existing mineral infrastructure sites and implies the need for appropriate policies to ensure the adequate safeguarding of these sites, this also applies to policy for allocations. It is inappropriate and contrary to the aims of national policy to disregard the Kings Cross Site's safeguarded status and not produce a policy that fully addresses the Aggregate Safeguarding Area and emphasises the importance of the operations within the area.

Allocation S20's policy requirements set out the need to mitigate the impact of existing sources of noise, air pollution and other nuisance generating activities in accordance with the Agent of Change principle. However, the policy remains vague and does not set out how impacts from the existing committed development (i.e. Tarmac's Concrete Plant) can be mitigated e.g. through allocation layout amendments or screening. Tarmac are concerned about this juxtaposition of potential conflicting land uses (particularly the potential for sensitive residential receptors) without any detailed guidance.

In addition to this, Tarmac's operations can take place throughout the night for 30 days per year. Inevitably, this would give rise to adverse noise impacts to any sensitive receptors, and this operation is protected by the Agent of Change principle. It is our view that the residential element should be removed from this allocation or more detailed guidance provided which is explicit on the importance of the continued use/function of the aggregate developments. Even with noise mitigation measures, this could still result in adverse impacts to any occupiers and therefore contradicts emerging Policy A4 *Noise and Vibration* and emerging Policy A1 *Protecting Amenity*.

Furthermore, Policy A1 seeks 'to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas', the residential element does not align with the characteristic of the surrounding area, which is a well-established and long-standing industrial area.

In addition to potential amenity effects, the allocation also proposes to improve conditions for pedestrians and cyclists along Freight Lane. As illustrated in Figure 2, Freight Lane is the sole vehicle access for both concrete plants, therefore this road is used by HGVs and other vehicles when transporting aggregates by road. This policy requirement is inappropriate and incompatible with the Site's safeguarded status, as it fundamentally undermines the ability of the Site to operate as an aggregate facility as it could jeopardise transport of aggregate by HGVs and could pose a danger to pedestrian and cyclist users of the road. Therefore, this does not align with the Agent of Change principle within the emerging Camden Local Plan, or as set out in the London Plan and national policy.

### Conclusion

As a Mineral Planning Authority (MPA), it is Camden's responsibility to 'safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material' (Para 223 NPPF, 2024). It is clear that there is a lack of emphasis within the emerging Local Plan Policies on the importance of concrete manufacture facilities, especially those that are rail fed such as that situated at Kings Cross.

Based on the above, Tarmac call for the removal of the housing allocation of 210 self-contained apartments as set out in Allocation S20, due to the potential for conflicting land uses. As proposed it contradicts with policies A1 and A4 within the emerging Camden Local Plan, as well as the Agent of Change Principle and the safeguarded status of the Site, which should be protected as per national policy and the London Plan.

Thank you for the opportunity to submit these comments. Please keep us updated on progress of the emerging Plan preparation.

If you have any queries or require any further information then please do not hesitate to contact us.

Yours faithfully,



Beth Roberts

**Heatons**

Date: Fri, 27 Jun 2025 12:25:49 +0100  
From: Penny Souster  
To: [redacted]  
Subject: Camden Local Plan: formal objection to site C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)

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

From  
Penny Souster  
[redacted address]  
[redacted postcode]

[redacted]  
[redacted email]

Dear Sir/Madam

Site C27 of Draft Local Plan: Land East of Constable House, Adelaide Road (Traveller and Gypsy Site)

It has come to my attention that Camden Council is considering allocating the land east of Constable House on Adelaide Rd as a site for gypsy and traveller accommodation. I wish to express surprise and concern that this site should be considered at all viable for such use and to request that this proposal be removed from the Camden Local Plan Proposed SubmissionDraft (Regulation 19) in favour of a more appropriate site - found in consultation with all affected communities

There are many reasons why the above site is unsuitable. -

1. It is currently a much-valued community amenity space with existing mature trees and a newly developed area of wildflowers and fruit trees - supported by Camden Council. It also contains a children's playground and space for games and exercise. Such an area is vital as green space for the young and residents of high density accommodation.

2. It is overlooked on all sides, making it unpleasant for the traveller community, undermining the principle of mutual privacy and residential amenity and putting it in conflict with Planning Policy for Traveller Sites (PPTS, 2003, para 13c)

3. The site is mapped as a Flood Risk Zone making it unsuitable for Traveller pitches which are considered 'Highly Vulnerable Use' under Planning Practice Guidance.

4. Access to this site is very limited with a potential to cause

considerable disruption

Above all, the proposal of this site is inconsistent with other policies aspired to in the draft Camden Plan - to provide improved sport and leisure facilities for young people, to develop new and enhanced areas of open space for play and access to nature, and to enhance greening and biodiversity.

It seems strange that this site could be thought remotely suitable, with no reason given for its choice when it is manifestly inappropriate. In addition there seems to have been no consultation over this proposal. I therefore request the deletion of 'Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation from the following parts of the draft Camden Plan -  
Ch. 4 Central Camden, Table 5; Ch.7: Meeting Housing Needs: Policy H11, Draft Policies Map and Schedule of Proposed Local Plan Site Allocations.

With thanks  
Yours faithfully  
Penny Souster

Responder 501

Date: Fri, 27 Jun 2025 11:26:02 +0000

From: Simon Gunasekara

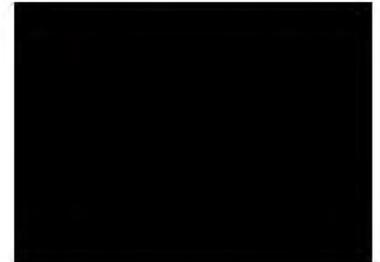
To: PlanningPolicy

Subject: Representations to the Regulation 19 Camden Local Plan - 24-[redacted address] (Parcelforce)

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AMM/LLJ/SJG/DP7102  
27 June 2025

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



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

**FAO: Robert Farnsworth – Principal Policy Officer**

Dear Robert,

**24-86 Royal College Street (Parcelforce) - Representations to the Regulation 19 Camden Local Plan**

We write on behalf of our client, Reef + Partners Limited (“Reef”), to make representations to the Regulation 19 consultation of the Proposed Submission Draft of the Draft Local Plan, published in April 2025 (the “Plan”).

Reef are a major developer and key stakeholder in the Borough and welcome many of the new policies in the Plan and support its aspirations to deliver growth across the Borough. We would further endorse many of the points raised by the London Property Alliance’s Camden Working Group which has made representations on behalf of the industry.

In preparing these representations, we have considered the tests within the National Planning Policy Framework (“NPPF”) and whether the Plan and its policies are sound, meaning positively prepared, justified, effective and consistent with national and regional policy. We have also reviewed and analysed the evidence base where relevant to interrogate certain policies in detail.

These representations are made primarily in relation to Reef’s most significant active site in the Borough, being the former Parcelforce site at 24-86 Royal College Street (“the Site”) which they are actively taking forward at pre-application stage. Reef are also in the process of building out the nearby Tribeca development (ref. 2021/2671/P) delivering a significant quantum of research and development floorspace. Parts of the development are already occupied, and completion is expected later this year. Reef see great potential in the continued development of the Knowledge Quarter both at a Local and National level and have the unique benefit of direct experience in attracting investment and new business/knowledge quarter users to the borough. Importantly, we recognise the borough is seeking to achieve a variety of objectives but note the need for flexibility in ensuring deliverability.



The Site has an existing allocation in the 2013 Site Allocations Local Plan and the allocation has been through iterative changes since the updates were made in the 2020 site allocations plan, with some minor revisions at Regulation 18 stage.

These representations relate primarily to the draft Site Allocation S7, as well as general commentary and suggested alterations to the development management policies, many of which make minor alterations to those contained in the adopted Local Plan.

We also note that the Greater London Authority are in the process of preparing a new London Plan with the “towards a new London Plan” consultation running almost in parallel with Camden’s consultation. The tone of that consultation seeks to make London’s Spatial Development Strategy more high level with a major emphasis on the deliverability of development, primarily to address the Capital’s housing crisis but also to ensure that economic growth is facilitated.

### Site Allocation

Reef are broadly supportive of the aspirations of draft allocation S7 and the Site’s ability to deliver substantial economic growth and make a contribution to the delivery of housing. Reef agree that the Site is uniquely positioned to provide a significant contribution to the growth of the Knowledge Quarter through the delivery of high quality, purpose-built lab space on the doorstep of some of the country’s most revered institutions.

The delivery of high quality, purpose built laboratory and research space in emerging clusters is a major factor in this Government’s plans for improving economic outlook in the medium and long terms, and is recognised as a critical growth sector. The provision of operable employment space that contributes positively to the borough is supported at all levels of planning policy. The Government’s consultation on the revised NPPF explained that revisions are intended to provide support for key industries, including for laboratories, stating that “access to laboratory space is essential to the UK’s research and development activities, keeping the UK at the cutting edge of research-intensive sectors such as the life sciences. Scaling up the right lab space to meet growing needs in our world leading clusters is critical to economic growth. It attracts talent and underpins the development of many groundbreaking new discoveries such as precision medicines or quantum technologies.” The recently published London Growth Plan also recognizes that the Knowledge Quarter has been identified as an “incubator” for the UK with globally recognised significance of its research outputs.

Given the support for and importance of maintaining investment in the Knowledge Quarter to facilitate its growth it is important the potential of the Site to positively contribute to these aspirations in a major way is both recognised and explicitly supported and actively encouraged within the site allocation. The delivery of research and development/life science uses should be recognised as a priority and key driver for the Site.

Reef have reviewed the evidence base for the Local Plan, particularly the viability evidence and the site allocations topic paper and consider that the draft allocation has not relied on the evidence in relation to site capacity in particular and the increase in the indicative housing capacity since the 2020 publication of the draft Plan.

Beyond the site selection topic paper statement that “site capacity design work” for housing has been carried out, it is not apparent how the Site’s residential capacity has been formulated, nor why the



indicative housing capacity has increased from 250 homes in the 2020 draft site allocation to 280. The site allocation also expects an intensification of employment floorspace, which is particularly relevant given the location within the Knowledge Quarter, so striking the right balance of uses will be paramount to the success of any future scheme.

It is Reef's view that in order to enable the comprehensive, mixed use redevelopment of the Site, the allocation should not be prescriptive and the quantum should be guided by the design process and balancing the employment and residential priorities. The design elements to be considered would include, but are not limited to the distribution of public realm, new routes and connections, townscape considerations, as well as the relationship between residential and employment uses on the Site.

It is acknowledged that the housing target identified is indicative, but in cases where a site is allocated for a mix of uses, particularly since the Plan doesn't allocate specific employment growth targets spatially or within the individual allocations, the overarching policies and individual allocations must recognise that a balance needs to be struck between employment and housing uses and that housing capacity can and should be established through a pre-application process.

The Council's approach to tall buildings at draft policy D2 of the Plan is generally supported, however the criteria set out at part C should not be applied prescriptively (including specifically C5, relating to delivering affordable housing in line with Policy H4). The application of these criteria should be considered in the round and on a scheme specific basis. Reef welcome that the draft allocation recognises that the site could be appropriate for tall buildings, and the height prescribed in the site allocation provides a useful starting point but should not be seen as an absolute cap, subject to detailed design and townscape considerations which may justify additional height.

It is welcomed that the allocation acknowledges the two different ownerships across the entire allocation. The allocation could include more detailed guidance about how the Council imagine the sites being delivered separately from a design and site capacity perspective, while noting the comments above regarding a design-led process.

### Housing Policies

Draft policy H2 of the Plan relating to securing housing from mixed use development has been updated to extend the spatial area where the formulaic approach takes effect (within the "defined areas" at paragraph 7.39). This area now includes the Site, which means it will be subject to this mixed use policy where it previously was not applicable.

The prescriptive and formulaic approach set out in this policy presents a significant challenge to delivering comprehensive development at the site and could generate a requirement for a significant quantum of housing, potentially in excess of the site allocation figure, which could negatively impact on the ability of the Site to optimise the delivery of employment uses which contribute to the Knowledge Quarter. Compared with the adopted policy H2, which applies in the Central London Area (The CAZ) and town centres, it is not clear why the Council have expanded the area to include all of the new south Camden sub-area (and others) and why this is necessary.

Reef recognise that larger sites such as ours have a role to play in meeting housing needs but are concerned with a blanket requirement for 50% of all uplift in floorspace. The Site sits in such a significant growth area for life sciences and the Knowledge Quarter and the importance of recognising



the sites potential for economic growth and clustering of this key growth sector should not be understated.

If draft policy H2 is to remain, the locational requirements should be clearer, the current definition is overly complex, and should be reinstated to the Central London Area/CAZ and town centres. Sites that are outside of these designations should be intensified through site allocations proactively or through development management. The Plan makes clear that residential is the priority land use in all other parts of the Borough so prescribing a mix of uses through the formula is not considered to be justified.

Flexibility should be introduced to mitigate the prescriptive nature of the policy and enable more consideration around delivering the appropriate types and tenure of housing, including affordable housing, rather than being overly focussed on quantum. This should include recognition that where there is an overprovision of affordable housing—the priority land use—against policy targets, that this represents a financial disbenefit to an applicant that should be considered positively in the round and in the context of securing the appropriate quantum and types of housing.

Policy H4 of the Local Plan relating to affordable housing is generally supported, recognising that it is to be read alongside Policy H2, but should be clearer about when a payment in lieu will be acceptable. The policy should be amended to clarify when the Council will consider this acceptable or as a minimum provide a set of criteria for it to be assessed against to make the policy more specific and effective.

### Inclusive Economy

The strategic aspirations of draft policy IE1 are supported.

Draft policy IE3 relating to Industry should be revisited, and Part B of the policy should recognise that the loss of industrial and warehousing can be acceptable where specified in a site allocation or in justified circumstances where being replaced by another economic/employment generating use (such as life sciences, research and development or offices), particularly those located in established clusters such as the Knowledge Quarter. Part C should also recognise that the Local Plan identifies opportunities to intensify, relocate and cluster these uses. The London Plan requires boroughs to proactively plan for industrial capacity and there are instances where the loss of industrial floorspace is appropriate on many sites because the Local Plan has planned for industrial capacity across the Borough.

It is not considered proportionate to require marketing exercises for the loss of these uses, particularly where a site (as is the case with the Parcelforce site) is subject to a site allocation which does not include these uses, and the judgement should be a more balanced one by decision makers taking into account the potential of the site to be optimises for housing or economic growth.

The aspirations of the affordable workspace approach at draft policy IE4 are welcomed, and Reef support the revised requirement from gross floorspace to net uplift (when compared with the previous Regulation 18 draft of the Plan). It is welcomed that there is flexibility in the level and depth of discount in recognition that a range of sizes and costs can be beneficial in supporting the inclusive economy. It is also welcomed that a payment in lieu of affordable workspace option is available in appropriate circumstances, provided that these are viable and do not compromise delivery of development.



### Conclusions

We thank you for the opportunity to be consulted on the Plan. There is much within the Plan that is supported and we look forward to continuing discussions with Camden about our exciting pipeline of new projects, and would reserve the right to be party to an Examination in Public in due course on behalf of our Client.

Please contact Alexandra Milne or Simon Gunasekara of this office to discuss further.

Yours faithfully

*DP9 Ltd.*

**DP9 Ltd.**

Date: Fri, 27 Jun 2025 12:40:21 +0100

From: Maren Bannon

To: [redacted]

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

---

Camden Planning Department,

I am writing to express my strong opposition to the inclusion of Site C27 – the land east of Constable House, Adelaide Road – in the Camden Local Plan as a proposed site for Gypsy and Traveller accommodation. I believe this site should be removed from the following documents:

- 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 for Objection:**

- **Environmental Impact:** This area is an important Local Green Space with mature trees and wildflowers. It was recently enhanced with fruit trees and wildflower planting as part of the Communi-Trees initiative, a community project involving local youth and organizations such as the KOKO Foundation, Think & Do, and Camden Council. If this site were developed, these newly planted trees and a substantial number of mature holly trees (approximately 30-60) would be destroyed.
- **Overlooking and Privacy Concerns:** The site is surrounded on all sides by residential buildings, including Constable House, Provost Road, the Etons, and the new development at 5-17 Haverstock Hill. Additionally, it is located near a busy road and bus route, all of which raise significant concerns about privacy and the impact on local residents' quality of life. There is also a lot of drug dealing on that corner and in the surrounding blocks, which needs to be dealt with before adding more development.
- **Flood Risk:** The site is located within a flood risk zone, and recent flooding has already affected the area. This contradicts the Government's Traveller Sites Planning Policy (paragraph 13), which specifically advises against developing in flood-prone areas.
- **Playground Loss:** The site was originally developed as a playground for the residents of Constable House and continues to serve that purpose today. It is also noted as a playground on historical maps. There is no nearby alternative play area, and the loss of this space would be a significant blow to the local community, especially for children. I hear the children from Constable House playing in that area every evening. It would be a shame for local children to lose the very small amount of outdoor space available.
- **Loss of Amenity Space:** The land in question currently serves as open space and is a crucial amenity area for residents of Constable House and the surrounding community. Developing this site would significantly impact the quality of life for local residents, particularly in such a densely populated urban area.

The constraints outlined in the Gypsy and Traveller Site Identification Study (Table 1) do not seem to have been properly considered for this site. This includes the proximity to residential areas, local green space, playgrounds, and concerns about overlooking, flooding, and access. Moreover, the proposal contradicts Camden's own policies that aim to improve sport and leisure facilities, enhance green spaces, promote biodiversity, and implement sustainable drainage systems.

Additionally, it is concerning that there has been no consultation with local residents regarding this proposal. Many, including those living in Constable House and the Etons, seem unaware of the plan.

**Conclusion:**

Given these concerns, I respectfully urge that Site C27 be removed from the Camden Local Plan.

I would also like to request participation in the examination hearings of the Draft Local Plan.

Thank you for considering my objection.

Sincerely,  
Maren Bannon

Date: Fri, 27 Jun 2025 12:49:25 +0100  
From: Chloe Bransby  
To: [redacted]  
Subject: Site C27 (Proposed Gypsy Traveller Site) on Adelaide Road

---

Dear Camden Council Planning Policy Team,

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

I have lived in the area for four years and chose to make my home here because of its unique mix of urban vibrancy and community feel. While I fully support Camden's duty to provide inclusive accommodation, this particular site is entirely unsuitable, both for future residents and for the surrounding neighbourhood.

**This location fails key planning and policy tests and would create real challenges for any family living there.** It is one of the busiest pedestrian thoroughfares in the borough, right beside Chalk Farm station and the route to Primrose Hill, and is surrounded by constant footfall, scooter bays, bike hire, and Zipcar bays. It is not a peaceful or private location, nor one that would allow for a safe, settled domestic life.

The site also directly borders a children's playground used by Constable House residents and sits on land recently enhanced by the CommuniTrees initiative, a community-led greening project involving local youth planting fruit trees and wildflowers. This investment in shared space and wellbeing would be lost, along with an opportunity to build on local environmental engagement.

There are also serious concerns around **access and safety**. The site is hemmed in by narrow lanes, heavy parking pressure, and shared public use, creating real barriers for service and emergency vehicle access. It is hard to see how this site meets Camden Policy H10's requirement for safe and appropriate access.

Beyond the practical concerns, I want to highlight the process itself. Residents were not informed about Site C27 during the earlier consultation phases, and many of us only found out about it recently, raising fair questions about transparency and community involvement. Any proposal of this magnitude deserves full and open dialogue, not a rushed or opaque allocation.

Finally, Site C27 appears to contravene several policies in the Local Plan, London Plan, and PPTS, including criteria related to environmental suitability, compatibility with surrounding uses, privacy, and the protection of open space.

I urge the Council to reconsider this site and to prioritise locations that are truly suitable, both in terms of planning standards and in ensuring dignity and safety for Traveller families.

Yours sincerely  
Chloe Bransby

# Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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

This form has two parts –

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

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

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

## Part A – Submit only one copy of this

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

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

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

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

**Name or Organisation:** Chloe Bransby

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

Documents can be found at the following links:

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

Paragraph  Policy  Policies Map

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

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

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

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

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

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

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

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

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

Refer to separate sheet

(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 respectfully request that:

1. Site C27 be removed from all references in the Local Plan submission draft, including:

Chapter 4: Table 5

Chapter 7: Policy H11

Draft Policies Map and Site Allocations Schedule

2. A transparent, policy-compliant review of all shortlisted sites be undertaken, with clear scoring criteria and genuine public consultation.

This would ensure compliance with the NPPF, legal precedent, and the Council's own planning guidance, and restore credibility to the process.

(Continue on a separate sheet if necessary)

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

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

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

No

Yes

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

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

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

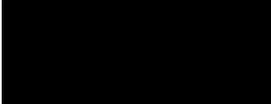
(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector's Report is published	X
(c) when the Camden Local Plan is adopted	X

**Privacy Notice**

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

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

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

<b>11. Signature:</b>		<b>Date:</b>	
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## **Response to question 6:**

I object to the proposed allocation of Site C27 - Land East of Constable House - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Reg. 19). The allocation is unsound and legally questionable for the following reasons:

### **1. Loss of Valued Informal Green Space**

The site functions as a longstanding informal amenity space, used by residents (particularly children and the elderly) for recreation and community greening (“Communi-Trees” project). Although not formally designated, it satisfies NPPF criteria for Local Green Space and is protected under:

- NPPF 99–101
- London Plan Policy S4
- Camden Policy A2(e)
- Case law: *Copas v RB Windsor & Maidenhead [2001] EWHC 548*

### **2. Overlooking and Privacy Violations**

The site is heavily enclosed by multi-storey flats (Constable House, Eton Hall, Eton Rise), causing:

- Mutual loss of privacy and residential amenity
- Breach of Camden Amenity Guidance (2021)
- Conflict with PPTS 13(c) and *Moore v SSCLG [2013] EWCA Civ 1194*
- Potential infringement of Article 8 ECHR

### **3. Inappropriate Flood Risk for Vulnerable Use**

The site lies within a mapped Local Flood Risk Zone and surface water risk area. Traveller accommodation is classed as “highly vulnerable” and therefore inappropriate under:

- PPG Sequential & Exception Tests
- NPPF 167
- PPTS 13(g)
- Appeal precedent: *APP/B5480/A/11/2151483*

### **4. Undeliverable Due to Vehicular Access**

The site lacks suitable vehicular access. It is served only by narrow estate roads and pedestrian paths unsuited to caravans, emergency services or waste collection, violating:

- Manual for Streets access width standards
- PPTS 13(b)
- Equality Act 2010 (risk of unsafe, unequal provision)

## **5. Opaque Site Selection Process**

Of 21 shortlisted sites in the 2024 AECOM GTSIS, only two (including Site C27) were proposed without a transparent rationale. Site C27 was introduced at Regulation 19 stage with no prior consultation:

- Violates NPPF 16(d)
- Breaches principles of the Council's Statement of Community Involvement
- Undermines community participation

## **6. Breach of Site Selection Methodology**

AECOM's GTSIS excluded:

- Sites within 18m of 4+ storey blocks
- Flood-risk areas
- Amenity/play spaces
- Sites without vehicular access
- Site C27 meets all four exclusion criteria, yet was advanced without justification—undermining evidence-based planning.

## **7. Failure to Consider Better Alternatives**

There is no published scoring matrix or objective rationale for why 19 alternative sites were rejected despite similar (or lesser) constraints. This contravenes:

- NPPF 35: tests of justification, effectiveness, and consistency
- Legal duty to explain why this strategy was adopted over alternatives

Date: Fri, 27 Jun 2025 12:53:03 +0100  
From: Charlotte Black  
To: [redacted], [redacted], [redacted], [redacted]  
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road  
(Gypsy And Traveller Site) Of Draft Local Plan.

---

  
Dear Sir/Madam,

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

I submit this representation [redacted]. I live directly opposite the proposed site.

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, we believe its allocation to be unsound on the grounds that it fails the key tests of justification, effectiveness and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

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

#### OUTLINE OF REPRESENTATION

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

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. The space contains a number of mature trees and has in the last few months been planted with a number of fruit trees and an area of wildflowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.

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

While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas. Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents.

The loss would be contrary to:

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

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

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

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

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

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

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

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

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

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

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable and would, without question, cause serious disruption to the residents of Constable House.

This constraint breaches key policy requirements:

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

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

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

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

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

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

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites:

- Within 18m of 4+ storey buildings (overlooking);
- Used as amenity or play space;
- At risk of surface flooding;
- Without safe vehicular access.

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

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

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

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

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

## **8. Better Alternatives Exist**

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

The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of:

- Justification (why this site over others);
- Effectiveness (deliverability);
- Consistency (application of methodology).

## **MODIFICATION PROPOSED**

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

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

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

## **PARTICIPATION IN THE EXAMINATION HEARINGS**

I wish to participate at the examination hearings in order to ensure that my interests and views are faithfully represented.

We thank you in advance for according my representation the appropriate level of attention.

Kind regards

Charlotte

Responder 505

Date: Fri, 27 Jun 2025 11:54:40 +0000  
From: Jani Eväkallio  
To: PlanningPolicy  
Subject: Holmes Road Recycling Center

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I am a resident of Camden, living in the [REDACTED]

I have learned that the council plans to erect a Recycling Centre on Holmes road.

Based on the assessment of mortgage broker EEMC and Liz Syms from Connect Mortgages, umbrella mortgage broker with 300 members, the erection of a Recycling Centre on Holmes Road will devalue house prices up to 200 meters from the new planned site, and mortgages will become more expensive for all these roads.

As mortgage payers and property owners in the area, this puts me and my family I to financial uncertainty.

I would like to hereby record my objection to this new planning application, which seems to unfairly devalue the existing properties instead of the new housing developments that it services.

Thank you for your attention to this matter.

Best regards,  
Jani Eväkallio  
[REDACTED]

Responder 506

Date: Fri, 27 Jun 2025 11:56:17 +0000  
From: Natalie Saffer  
To: PlanningPolicy  
Subject: Objection- Proposed Allocation of Site C27

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# Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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

This form has two parts –

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

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

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

## Part A – Submit only one copy of this

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Natalie"/>	<input type="text"/>
Last Name	<input type="text" value="Saffer"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="N/A"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="N/A"/>	<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**

<b>Name or Organisation:</b>
------------------------------

**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	4.12 & 4.13	Policy	C1	Policies Map	Figure 13 (pg110)
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

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

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

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

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

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

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

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

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

<p>Grounds for Objection</p> <p>1. Legal Non-Compliance</p> <p>The allocation of Site C27 is not legally compliant with the Local Plan preparation requirements specifically:</p> <p>a) Lack of Adequate Consultation: At no stage before the publication of the Submission Draft in May 2025 was the identification and allocation of C27 made clear to local residents. This deprived residents of Constable House, Primrose House, and neighbouring properties of a meaningful opportunity to be part of the consultation nor offer any comments. Consultation was neither fair nor transparent, as the site was absent from the initial list of 18 assessed in the Gypsy &amp; Traveller Site Identification Study (November 2024) and Topic Paper (April 2025).</p>
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• **Timeline and Process Issues:** In particular, the two Gypsy and Traveller sites were only identified in the Submission Draft Local Plan published in May 2025. Policy H11 in the Draft Local Plan 2024 merely expressed an intention to identify such sites but did not specify any locations. The Gypsy & Travellers Site Identification Study (GTSIS), a consultant's report published in November 2024, was only posted on the Council's website on 24th December 2024, leaving just over a month for public feedback (due by 29th January 2025). Even then, the GTSIS shortlist of 18 potential sites did not identify the land east of Constable House as a potential site. A further assessment of these shortlisted sites, published in a Topic Paper in April 2025, again failed to specifically identify this land.

• **Limited Opportunity for Local Input:** Due to this timeline, local residents were only able to raise concerns about the allocation of the land east of Constable House during the late consultation period on the Submission Draft Local Plan in May 2025.

b) **Failure to Apply Site Selection Criteria Consistently:** Paragraph 2.23 of the GTSIS clearly states that amenity land associated with housing estates is generally considered unavailable and unsuitable for allocation because access to private open space for residents of Council owned property is constrained by the dense urban nature of the area. C27 is precisely such land - a long-established amenity space for Constable House residents. Yet no justification has been given for why this constraint was disregarded.

1c) **Failure to Comply with Equality Act 2010:** While Camden Council has undertaken an Equality Impact Assessment (EIA) for the Draft Local Plan 2025, there doesn't appear to be any publicly available, site-specific EIA that considers how the removal of local open space at Site C27 affects vulnerable residents, including young people, the elderly or disabled living in the adjacent housing. Instead, the EIA focuses narrowly on elder-friendly building design and disabled parking, overlooking the broader impact of removing open space on the wellbeing of nearby elderly and disabled residents, despite acknowledging that open space is vital for health, social connection, and reducing isolation. It also fails to assess the potential impact on the privacy and wellbeing of future Traveller residents, as required by national planning guidance.

## 2. Unsoundness of the Plan

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

### a) Inappropriate Use of the Site

• **Loss of Privacy:** The site is highly visible, located at the busy intersection of Adelaide Road and Eton College Road, along a heavily trafficked east-west bus route. This position compromises the privacy not only for future site occupants, but also for existing residents in Primrose House, Constable House, the Etons and Provost Road as well as the new residential block construction at 5-17 Haverstock Hill (identified as C25 in the schedule of allocated sites) as the proposed site will be overlooked on all sides by buildings which are between four and six floors in height.

• **Loss of communal open space:** At 661 sqm, the site lies within the curtilage of Constable House and has always formed part of its communal open space which should be protected under Chapter 11 of the draft Local Plan. In such a dense urban setting, loss of green space is significant and irreparable.

• **Loss of play area:** The site has historically served as a play area, marked as a playground on OS maps, and is used by local children for informal recreation - a use that is consistent with Local Plan policies (specifically Chapters 10 and 13) to protect play space and green infrastructure.

### b) Increased Traffic

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

### c) Flood Risk

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

### 2d) Failure to Apply Selection Constraints Evenly

• Camden's site selection principles excluded amenity spaces yet C27 was selected, even though it clearly functions as an amenity space for surrounding residents and has no independent access. This contradicts the Council's stated selection criteria and appears to have been done without public disclosure or explanation at earlier stages of the plan.

• At the same time, other sites that may have been more suitable were excluded from the final shortlist without transparency. For example:

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

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

Several other sites were also excluded including Frideswide Place.

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

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

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

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

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

### 3. Failure of the Duty to Co-operate

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

### 3Conclusion

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

(Continue on a separate sheet if necessary)

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

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

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

(Continue on a separate sheet if necessary)

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

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

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

No

Yes

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

Representatives of Primrose House NW3 Limited shall attend any hearings to ensure the views of the residents of [REDACTED] who have been denied meaningful consultation and transparency throughout the process are heard and considered.

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

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

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

**Privacy Notice**

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

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

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

<b>11. Signature:</b>	<b>Natalie Saffer</b>	<b>Date:</b>	<b>27<sup>th</sup> June 2025</b>
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

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

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

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

## 3. Soundness

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

- ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

#### **4. General advice**

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

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

Responder 507

Date: Fri, 27 Jun 2025 11:57:58 +0000  
From: Jade Patel  
To: Nicola Tulley, PlanningPolicy  
Subject: RE: Camden Local Plan consultation

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**From:** Carolina Caneva <[redacted email]>  
**Sent:** 25 June 2025 12:52  
**To:** Jade Patel <[redacted email]>  
**Subject:** FW: Camden Local Plan consultation

Hilson Moran



**Subject:** RE: Camden Local Plan consultation

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# Camden Plan Consultation

27th June 2025 Deadline



Personal Details of Submitter

1st Contact Name Jade Patel  
 Jade Patel's email address  
2nd Contact Carolina Caneva  
 Carolina's email address  
Company  
 Address  
 Company Telephone Number  
 Company E-mail Address

Section / Policy		Hilson Moran (HM) Comment 2024	Hilson Moran (HM) Additional Comment 2025
<b>Chapter 2 - Development Strategy</b>			
Policy DS1: Delivering Healthy and Sustainable Development		1 - No mention to creating social value at both construction and operational stage of development. This is recommended to be included.  2 - The policy is fairly standard, except for major development, as they have to contribute to the council's citizen scientist community research programme.	Same as before - previous comments were not addressed 1 - No mention to creating social value at both construction and operational stage of development. This is recommended to be included.  2 - The policy is fairly standard, except for major development, as they have to contribute to the council's citizen scientist community research programme.
<b>Chapter 8 - Responding to Climate Change</b>			
CC1 - Responding to the climate emergency	same as before	1 - Note that the policy refers to 'Net zero in operation - assume aligns with CRREM/ UKGBC Targets'. More clarity if this is for base building or/and tenants.	(Ref A,4) It is still unclear whether 'net zero carbon' in operation refers to the London Plan definition (regulated energy only, achieving 100% savings relative to Part L Target Emission Rate) or voluntary industry definitions such as the UK NZCBS (Pilot and subsequent versions), UKGBC guidance, CRREM, etc. Later in Policy CC4, 'Net Zero Carbon Toolkit - Etude et al.' is referred to (this was written for a number of non-London boroughs), and in Policy CC6 caps on energy use intensities and other criteria are provided that could be interpreted as the Net Zero Carbon criteria for the Council, but this is not clear here either.  How would this be demonstrated for planning in reality? As it would happen after planning?  500m2 can be a good threshold for sustainability statement, but in some schemes the works are so limited that there are not many things to include. Other borough have started using the 500m2 as threshold for various sustainability requirements, but it might be that a good starting point for major developments to be 1,000m2.
CC2 - Repurposing, refurbishment and re-use of existing buildings	CC2 - Prioritising the retention of existing buildings	1 - (Paragraph C) Clarity on methodology. Are the essential topics to be explored for the feasibility assessment?  2 - (Paragraph D) If the assessment is to include a WLC optioneering piece, this has to be third party verified through Camden council's appointment.  3 - (Paragraph 8.10) We appreciate the aspiration of retaining materials, however, have Camden council considered the infrastructure/supply chain to support this? For example, storage may pose significant challenges for projects.	- B.1 - What are the specific topics or methodology to be included for the condition and feasibility assessment? - E15B.2 - What are the specific topics or methodology to be included for the development options appraisal? - D - What sufficient evidence is required to attain the Council's satisfaction when less than substantial demolition is proposed by the developer? - 8.13 - Is a conditional and feasibility assessment not required for schemes considering less than substantial demolition or 'retain and build'? - 8.13 - Does floorspace mean Gross Internal Area, Net Internal Area, or other? - 8.15 - What are the specific topics or methodology to be included for the condition and feasibility assessment? - 8.15 - Who's responsibility is it to hire the independent reviewer? - 8.15 - Does the council have a checklist/guideline for consistency in the review process? - 8.21 - Is a WLCA not required for schemes considering less than substantial demolition or 'retain and build'? - 8.22 - We strongly encourage the Council to consider the inclusion of the third party review for the condition and feasibility assessment, and options appraisal? - 8.27 - Is a WLCA and CES not required for schemes considering less than substantial demolition or 'retain and build'? - 8.30 - It would be beneficial for the industry to include a list of stakeholders for each waste stream within North London, as an appendix perhaps?
CC3 - Circular economy and reduction of waste	same as before	1 - (Paragraph vi) Does the mentioned 'Waste site' comply with the 95% diversion from landfill? If so, can you please provide a list of stakeholders for each waste stream to avoid traffic through Camden's waste site?	- C - Is a CES not required for schemes considering less than substantial demolition or 'retain and build'? - D - It would be beneficial for the industry to include a list of local sites available for temporary storage, as an appendix perhaps? - D - It would be beneficial to include an order of actions required to facilitate temporary storage of existing materials? - 8.34 - Who are the stakeholders to be contacted to enable the use of excavated material as suggested in the North London Waste Plan 2022? - 8.36 - What are the specific scenarios the Council expects a Construction Management Plan? - 8.36 - What are the specific topics or methodology to be included for the Construction Management Plan? - 8.43 - We request the Council to include a website link to the mentioned database to enable sharing of information? Additionally, specific topics/information to be included in the database should be provided?
CC4 - Minimising carbon emissions	same as before	1 - Use the carbon optioneering guidance approach for carbon calculations.  2 - When the Camden Plan refers to embodied carbon targets of 500-600 KgCO2/m2(GIA) for residential and commercial respectively, it should be specified that it is for 'upfront carbon'. In addition, it should be specified that those targets are based on current policy and RICS v1, as RICS v2 might have an impact on targets.  3 - How was the 600kgCO2/m2 total set and what is the consequence of not achieving this? You are in danger of team telling you what you want to hear to get planning then having issues in procurement and the as built being higher. We appreciate this is a very difficult situation. There are very few new builds in non-domestic buildings that achieve this level. Even a timber building will struggle in upfront carbon terms. We fully support decarbonisation but there will potentially be issues to achieve this.  4 - On the energy targets and offset based on EUI, there is need for more clarity on how this will work? * Is this set based on stage 2 performance at planning ? detailed design or at PC or in use? * The energy estimations will fluctuate. For offices how should tenancy be accounted for? * Can the inclusions in the EUI calculation and method be clarified This is a really interesting idea but need to consider implementation and what is expected for a level playing field.	- 8.21 - Is a WLCA not required for schemes considering less than substantial demolition or 'retain and build'? - 8.49 - We strongly encourage the Council to consider the inclusion of the third party review for the WLCA? - 8.49 - What are the penalties of not meeting the targets/performance produced during in the planning submission? - 8.52 - What benchmarks would be used for certain building types including hotels, student accommodations, etc.? (as not relevant to given benchmarks i.e. residential) - 8.52 - What sufficient evidence is required to attain the Council's satisfaction when aspirational WLC benchmarks can not be met?
CC5 - Energy reduction in existing buildings	CC5 - Sustainability improvements to existing buildings	1 - On the energy targets and offset based on EUI, there is need for more clarity on how this will work? * Is this set based on stage 2 performance at planning ? detailed design or at PC or in use? * The energy estimations will fluctuate. For offices how should tenancy be accounted for? * Can the inclusions in the EUI calculation and method be clarified This is a really interesting idea but need to consider implementation and what is expected for a level playing field.	The Energy Use targets have not been included in CC5  On part C about ideas for improvement, most of the ideas are part of the consequential improvements for PartL.  Also, we believe there should be a clear guidance on a minimum requirement for PVs in order to make them meaningful. There are many schemes with such limited area where there is always the conflict between green roof or PVs (due to fire risks). In addition, if measures are listed based on priority, external shading could be before PVs and heat pump installation should be reviewed if mechanical design proves is more efficient can work with existing systems and also there is a minimum thermal envelope performance. We suggest to have a feasibility study for heat pumps on existing buildings.

CC6 - Energy reduction in new buildings	CC6 - Energy use and the generation of renewable energy	<p>1 - (Paragraph iii) The office EUI target of 70 kWh/m<sup>2</sup> GIA/yr does not align with the UKGBC Net Zero Paris Proof target of 55 kWh/m<sup>2</sup> GIA/yr.</p> <p>2 - (Paragraph iv). 80 kWh/m<sup>2</sup> footprint of on-site renewable energy generation is unrealistically high.</p> <p>3 - (Paragraph vi) Monitoring should extend beyond the initial 5-year period, ensuring ongoing assessment of energy use and renewable energy generation. Additionally, there should be a provision for utilizing the monitoring results to implement measures aimed at reducing energy consumption.</p> <p>4 - (Paragraph vii) The Energy Assured performance method should also include a NABERS model as an acceptable assessment for predicted energy usage for non-residential schemes.</p> <p>5 - Note residential to be fossil free, however conflict with teaching facilities and schools, as they fall under 2 criteria. This may need to be more specific.</p>	<p>The BREEAM requirement seems to have moved to this policy now CC6 now called energy use &amp; the generation of renewable energy.</p> <p><b>Query 1 from HM's first consultation response:</b> However, there has to be an appreciation of Building being designed now. Currently a whole building energy consumption of 70kWh/m<sup>2</sup>(GIA) is not achievable, especially when talking about all different categories of office, retail, education and GP surgeries. All those types have totally different patterns of usage. In addition, it is good to have the whole building targets but there are so many assumptions on the tenancy side where it might be better to have a target for base build and whole building, at least for the office and retail. It is suggested that targets are reviewed and adjusted based benchmarks such as NZCS, UKGBC office buildings targets, etc. Stepped targets for the years to follow make more sense.</p> <p>The 20kWhm<sup>2</sup>(GIA) for heating in new developments with some existing elements can be tricky. Needs more specifications around existing fabric.</p> <p>The targets for existing buildings are way more relaxed in some occasions compared to the new built, mainly on the residential .</p> <p>BREEAM assessing in developments of more than 500m<sup>2</sup> is a threshold used in other councils too. However, there has to be a consideration of difficulties especially on retail units that are developed to shell only. Some credits can't be achieved for a min. of BREEAM Excellent with the current scheme (v6.1 and RFO 2014). Also, for some refurbishment even if they are more than 500m<sup>2</sup>, the scope of works don't allow many credits to be included , so this needs to be taken into account and have targets for different uses or a clause saying about reviewing feasibility.</p> <p>We support the combination of blue green roof and PV, however there are fire risks associated to green roofs and PV. Therefore, this has to be checked and aligned with that.</p> <p>The carbon offset with energy shortfall is a good idea, however, are there enough areas in the borough to have all the additional PV installations? It will be good to have other options too as probably the shortfall from all developments will not be only for PVs and for transparency is good to publish other options too.</p>
CC7 - Heat networks	same as before	<p>1 - We support the requirement for major developments located within 500m radius of energy networks to be designed for connection, and to prioritise connection where a network exists in that radius. However, the Council must urge the network providers to make design and technical details of requirements for connection and contact information clear, publicly available and up to date. The Council must also urge network providers to use the latest carbon factors (currently SAP10.2) in their calculation of the carbon intensity of the network, in line with the latest GLA guidance on the matter and with current Approved Document L of the Building Regulations.</p> <p>2 - The Council should note that a number of developers, landlords and occupiers have declared Net Zero Carbon in operation in alignment with industry standards and with an emerging national definition (UK Net Zero Carbon Standard). New proposals are 'all electric' in an effort to move away from fossil fuel combustion and in alignment with the Future Homes and Buildings Standard from day 1 of operation. Therefore, connecting to a network that will continue to run on fossil fuel for a number of years is out of sync with more ambitious environmental targets in the local community. It also results in poor outcomes in energy assessments, including Part L, NABERS UK Design for Performance and the London Plan/ Camden's Net Zero Carbon ambition, causing a contradiction in policy and making developments less attractive in the leasing market, de-valuing development. It is therefore requested that the policy is revised to enable an option to connect to the network only after the decarbonisation plan proposed by network operators is physically implemented, especially if it can be shown that connecting sooner has viability implications in relation to the above conflicts.</p> <p>3 - The policy needs clarity about decarbonising the existing networks, otherwise there is no point on prioritising connection.  * Has been thought about adding a specific carbon factor to the heat network has to achieve?  * In case the network has a decarbonisation plan, but the current carbon factors are significantly high, what is the plan for achieving the Energy hierarchy targets (i.e. 35% on be green?)  We recommend that some text around that should be added, which might need to be split based on usage i.e. residential and commercial. On residential the operational cost might be better with the heat network, and this has to come into the equation.  * A note to include decarbonisation plan such as: 'prioritise connection to that network provided that the network operator has agreed a decarbonisation strategy with the GLA and Camden Council.'</p>	<p>The updated policy document has acknowledged that existing energy networks rely on local fossil fuel combustion and may provide higher carbon energy than can be achieved by building systems. Nevertheless, the policy continues to include CHP, and prioritise connection to existing networks. The Council should evolve the London Plan's Heating Hierarchy to account for the status and absence of decarbonisation plans and execution for the borough's existing networks.</p> <p>Possibly a review between on site generation/installations and DH connection should be looked at planning Stage to be able to confirm that this is the most appropriate solution for each development, as suggested in comment for Policy CC5.</p>
CC8 - Overheating and cooling	same as before	<p>1 - (Paragraph ii) No mention of using TM52 or TM59 to assess the risk of overheating, which are well used methodologies by the industry. Is this because it will follow Part O of Building Regulations?</p> <p>2 - (Paragraph iv) Risk of glare to be considered where recommending reflective surfaces for sunlight.</p> <p>3 - (Paragraph v) Mitigation measures as trees to be identify in conjunction with wind microclimate studies.</p> <p>4 - In policy CC8 (highlighted in green in the draft plan) it is clear that passive measures need to be integrated. However, in this highlighted section there is no mention of Natural Ventilation or Mixed-Mode as primary passive measure to tackle overheating (only mentioned in paragraph 8.75 below).</p> <p>5 - 'Applications need to incorporate measures to cool spaces around buildings' Clarity to understand what is needed to demonstrate this, CFD?</p>	<p>In grey text are the comments that have been addressed from previous review in 2024.</p> <p>Natural cooling is mentioned now 8.113. Policy CC8 Overheating and Cooling: <i>Major development to undertake Overheating assessment in line with CIBSE guidance TM52 non domestic-TM59 domestic. Active cooling is unlikely to be accepted in new residential development</i> . We support this policy.</p>
CC9 - Water efficiency	same as before	<p>1 - 'strongly encouraged to achieve 85litres / per day'... This is very difficult to achieve in practice, and target should be reviewed.</p> <p>2 - 'Rainwater harvesting required on all new buildings'. Will all building be suitable for rainwater harvesting?</p>	<p>The three criteria essentially - say that water will be recycled- suggest that the wording is restructured and that start with all buildings are required to rainwater harvesting.... (this will also benefit the water quality in rivers by reducing storm sewer overflows.</p> <p>Then, the policy can say this can either: be supplemented / replaced by grey water recycling - to achieve Wat01, etc., or require all new build non-residential development to achieve 'excellent' for category Wat 01 of BREEAM:</p> <p>4. require all new buildings to include rainwater harvesting, appropriate to the scale and nature of the proposed development; and</p> <p>5. require major developments and high, or intense, water use developments, such as hotels, hostels and student housing, to include a grey water system, unless it is demonstrated to the Council's satisfaction that this is not feasible or practical.</p>
CC10 - Sustainable design and construction certification	this chapter is now included in CC6 - Energy Use and the generation of renewable energy	<p>1 - New requirement for residential development &gt;500m<sup>2</sup> to achieve BREEAM Excellent Domestic refurbishment. Review if this is for new build.</p> <p>2 - Standard BREEAM Excellent clauses in the policy. It will be useful to have 500sqm minimum.</p> <p>3 - On BREEAM how should mixed use building be accounted for?</p>	<p>CC10 has been updated in the revised version of the policy; therefore, BREEAM comments are now based on Section 8.8 and Policy CC6:</p> <p>1 - It is unclear whether the BREEAM Domestic scheme is required for any residential development over 500m<sup>2</sup>, or if BREEAM only applies to non-residential developments over 500m<sup>2</sup>.</p> <p>2 - For mixed-use buildings, how should BREEAM be applied? For example, achieving an Excellent rating will be challenging for Shell Only retail units due to the minimum standard required under Ene 01.</p> <p>3 - Since BREEAM Version 7 has not been formally published, it is currently unclear how easily an Excellent rating can be achieved under this version — particularly regarding the minimum standards in categories such as Energy, Water, and Materials, as well as the additional minimum credits required under other sections of the policy (e.g., Water).</p> <p>4 - Other comments:  *Will they now also be requiring BREEAM residential new construction Excellent?  *We think the mixed use is now covered in BREEAM V7  *Section 8.95 required BREEAM Excellent - this can be impossible for shell only buildings in some cases.  *Section 8.95 also asks for a certain % of credits to be achieved in materials, energy and water, as we don't yet have all the information for V7, it is difficult to comment on how achievable this is.</p>

CC11 - Flood risk	CC10 - Flood Risk	1 - Although the Flood Risk policy seems standard, as based on the NPPF, the Camden Plan has highlighted the Counters Creek Catchments, which include 85km <sup>2</sup> of the borough, and have a greater risk of flooding and that discharge rates should be "limited to minimise flooding there". This statement does not give additional guidance on what this limit should be (such as post development rates set to Greenfield or Existing, plus 20% betterment etc) and the policy is left open to interpretation.	Noted that previous comments have been addressed.
CC12 - Sustainable drainage	CC11 - Sustainable Drainage	1 - Camden states that ALL developments require permeable surfaces, and incorporate green and blue roofs, given how dense the borough is along with spatial restraints this will be difficult for smaller applications (i.e. dwellings with pitched roofs developments) to achieve this. 2 - Nationally, there is an obligation to provide SuDS for all major development. Within the council the requirement is that all major developments reduce surface water run-off rates to greenfield run-off rates. If Camden wants to be aligned with the London Plan, then some flexibility should be allowed and should be an "aim" to achieve greenfield (Refer to Policy 5.13 Sustainable drainage of the London Plan for more details).	The first point can be removed, as Policy CC12 has amended the wording to require permeable surfacing a green and blue roofs "where feasible". The second point refers to letter C within Policy CC12. The policy wording requires all major developments to reduce run-off rates to greenfield rates, whereas in Section 8.155 it is stated that "Where it is not possible to achieve greenfield run-off rates, run-off rates should be as close to this as possible". This should be reflected within letter C in Policy CC12.
<b>Chapter 10 - Supporting Camden's Communities</b>			
SC1 - Improving health and wellbeing		1 - Regarding the WELL building standard, it is not clear whether the council is expecting formal certification. The wording doesn't suggest this... so what is the council expecting? How will developers demonstrate that this is done? 2 - If a full WELL certification is expected, this is expensive and may not be realistic for all developments to achieve it. 3 - Refurbished buildings: Why are they excluded from these requirements? The idea is to improve resident's health & wellbeing, isn't? 4 - Is the WELL building standard only applicable to what they call 'Multifamily residential' i.e. not individual dwellings, it is not clear how this would be demonstrated in developments which cannot be assessed under WELL, e.g. houses.	We can see no mention at all of the WELL building standard in the policy - All they seem to require in terms of health & wellbeing is a 'Health impact assessment'. We agree that WELL assessments don't typically form part of planning requirements so I would not expect to see WELL assessments required as planning policy, and that Health Impact Assessments (HIA) needs to be undertaken for all major applications at early stage in the design process.
SC2 - Social and community infrastructure		1 - Hilson Moran welcomes the inclusion of neurodiverse community in housing, open space and pedestrian/wheeling/cycling sections of the policy. We propose that neurodiversity is included earlier in the 'Social & Community Infrastructure' section and clearly defined to form an integral part of 'Diversity', 'accessibility' and 'inclusivity' requirements, to avoid any doubt that the neurodiverse community is to be considered in all aspects of design, alongside protected groups, minorities and diverse members of society.	It is noted that neurodiversity is addressed across several chapters in the proposed Local Plan.
<b>Chapter 11 - The Natural Environment</b>			
NE1 - The Natural Environment		1 - "strong protection to maintain the openness and character of Metropolitan Open Land (MOL)" is very vague, specially when stating that there will be the protection of several habitat types in this section.	Same as before - previous comments were not addressed
NE2 - Biodiversity		1 - Emphasis on gardens should be referencing native planting within gardens, as ornamental and non-native species can become problematic for biodiversity of an area.	Same as before - previous comments were not addressed
NE3 - Tree Protection and Planting		Seems fine and in line with previous policies and BNG inclusions.	Seems fine and in line with previous policies and BNG inclusions.
<b>Chapter 13 - Protecting Amenity</b>			
A1 - Protecting Amenity			
A3 - Air Quality		1- The policy is broadly being lead by the GLA, from which we agree that a design led approach to minimising exposure of receptors to air pollution is the way forward. 2- One key thing to note is the early stage consideration of emergency backup power, where it states that non-combustion sources are expected. The policy has moved on since the previous version and is more robust in asking applications to go further in considering local air quality.	1. We support the strengthened and more detailed approach to addressing air quality in the borough, particularly the clearer requirements for Air Quality Assessments and as previously stated, the focus on design led approach to minimise exposure to air pollution, which has the added inclusion of using green infrastructure and nature based solutions. 2. The policy identifies the importance of early stage consideration of emergency backup power and states that non-combustion sources are expected, stating diesel or other liquid fuels (now including biofuel) should be considered only as a last resort. The policy has been refined further to include testing requirements and flue design measures of any proposed emergency back-up generators. Overall presenting a more stringent and robust approach in considering impacts of plant on air quality.
A4 - Noise and Vibration <i>inc. Appendix 3 - Noise Thresholds</i>		We generally agree with the noise thresholds, although below there are few comments: 1 - Relaxations should be included for plant and machinery noise impact on quieter background noise levels, i.e. lowest background noise level below 40 dB. Limit for commercial buildings receptors should be clarified as well. 2 - The 'Rating Level' for plant noise of 15 dB below background when tonal components are present, could be unnecessarily restrictive. In fact, the 'Rating Level' should already account for tonal elements so this is not appropriate when considering BS 4142. 3 - Vibration levels inside dwellings are given as a range rather than a limit, so it would need to be established which value would apply.	Appendix 4 Table B - It should be noted that the LAFmax criteria is not for all events. Typically this would be not to be exceeded more than 10 to 15 times a night, to avoid designing to anomalous peak events. Appendix 4 Industrial and Commercial Noise Sources - as previous comment, the Rating Level already accounts for tonality so further correction to 15 dB below background should not be applied. Appendix 4 Entertainment Noise - measurement limits are given for 'entertainment and plant noise', whereas different limits are already given for plant noise. This should just refer to entertainment noise. Appendix 4 Entertainment Noise - The requirement to achieve a level of noise intrusion at 31.5 Hz is unfeasible in design. There is no test procedure for facade constructions down to 31.5 Hz. It should also be noted that BS 8233:2014 is in the process of being updated. The 2014 version is specifically referred to in the document so it will be assumed that this is still the applicable document even if withdrawn by BSI.
<b>Chapter 14 - Safe, Healthy and Sustainable Transport</b>			
T1 - Safe, Healthy and Sustainable Transport		1 - We agree with the key aspect, which for the first time, there is a requirement for transport to promote (fund) green space within streets. This is interesting and a new approach, which is not currently commonly accepted by highway authorities, but as industry professionals we agree do agree with. 2 - Agree with the links to noise impacts on this policy.	Comments from first consultation response still applies.
T2 - Prioritising walking, wheeling, and cycling		No comments as typical transport policy	No comments as typical transport policy
T6 - Sustainable movement of goods, services, and materials		1 - Agree with policy, as it will require developers to consider impact during construction and sustainable modes, such as cargo bikes for cargo.	Comments from first consultation response still applies.

Date: Fri, 27 Jun 2025 11:59:02 +0000  
From: Sylwia Vargas  
To: PlanningPolicy  
Subject: Objection: Recycling Centre on Holmes Street

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My name is Sylwia Vargas and I'm a tenant at [REDACTED] ([redacted postcode]). I am currently in the process of buying the flat and securing the mortgage.

As a current tenant and future homeowner, I strongly object the plan to build a recycling centre on Holmes street. Not only will it contribute to the noise, traffic, and air pollution (things we already struggle with) but will certainly devalue the nearby properties (as stated by two independent brokers). Moreover, mortgages and remortgaging will be outside of the reach of the community which already is struggling. I know that myself I may not be able to remortgage my home in a few years time if the centre is built.

Erecting the recycling centre will be really detrimental for the integrity and wellbeing of the community. It seems cynical to place the centre next to long-term neighbors when a brand-new development is on its way and could well accommodate it there. Is the idea to dump the recycling next to the estates to benefit the expensive new homes?

Best,  
Sylwia Vargas

Date: Fri, 27 Jun 2025 12:01:26 +0000

From: Graham Williams

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

Subject: Planing Development of Land East of Constable House (Gypsy and Traveller Site)

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- From direct and indirect experience allowing gypsies and travellers on site will create large amount of disturbances.
- In heavy residential area the site will significantly increase crime, anti social behaviour and drug dealing increasing number and costs of police required.
- There are a large amount of visitors to the area of Primrose Hill who will be affected.
- Will create rubbish and damage to the site and surrounding area requiring additional council costs to clear.
- The plan would destroy and remove large and small trees in the site space (environmental impact).
- Impact the property prices in the area.
- Impact on people who use the local Chalk Farm underground station.
- Impact on local economy.
- Only details on Camden planning site which people do not regularly look.
- Going on since January 2025 and have not seen anything until recently.
- Planning proposal non-compliant in the spirit of community collaboration.
- Many people are completely against the proposed plan.
- Small notices around the area.
- No leaflet drops to residents.
- No resident consultation.
- No community engagement.
- Made feelings known to local news media.

This plan has not been thought out at all and will have serious impact on the local community, economy, environment, property prices, rubbish, anti-social behaviour and crime.

**Camden Residents**

Date: Fri, 27 Jun 2025 12:11:36 +0000  
From: Sophie Carter  
To: PlanningPolicy  
Subject: Draft Local Plan and Relocation of Regis Road recycling centre

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Learn why this is important at  
<https://aka.ms/LearnAboutSenderIdentification> ]

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

Dear Camden planning policy team,

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

In general, the plans seem to have many positive elements. However, the latest version released in March suggests placing the recycling centre next to residential properties on Holmes Road and opposite St Patrick's School - on part of the current police station site. This new aspect was not subject to public consultation in the same way as earlier iterations. Nearby residents, including us, were unaware of this change until a few days ago.

There is a broad consensus in our neighbourhood that it would be more suitable to place the recycling centre away from residential homes and a school and locate it in the light industrial/commercial area shown on the plans or further north towards the Murphy's site/railway.

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

Residents already suffer a great deal of antisocial behaviour and noise, including from the Stay Club on Holmes Road. Placing the recycling centre here will add to noise, air pollution and disruption, creating a substantial further negative effect on the amenity of residents and on the school community.

Many visitors to the current recycling centre leave their cars idling, so there could also be a potential effect on air quality for school children - despite attempts to limit traffic fumes with Healthy School Street zones and traffic restrictions in Holmes Road.

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

If the council is serious about developing Holmes Road and the area

towards the high street as an attractive neighbourhood and protecting school children from exhaust fumes and exposure to increased traffic then moving the recycling centre next to residential homes and a school is not the way to go about it.

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

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

Sophie Carter  
[redacted address]  
[redacted postcode]

Sent from my iPhone

Date: Fri, 27 Jun 2025 12:04:36 +0000  
From: Sophie Carter  
To: PlanningPolicy  
Subject: Nature corridor

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Dear Camden Planners

We live at [redacted address] NW5 and am writing to you in support of the proposed Nature Corridor mentioned in the policies listed below:

Policy Number

Policy C1, paragraph 19 for Central Camden

Policy N1 paragraph 7 for North Camden

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

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

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

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

Yours sincerely,

Sophie Carter

Sent from my iPhone

Responder 511

Date: Fri, 27 Jun 2025 12:07:01 +0000  
From: alan selwyn  
To: PlanningPolicy  
Subject: Response to Draft Local Plan from The Belsize Society

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

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

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

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

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

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

**Name or Organisation: The Belsize Society**

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

Documents can be found at the following links:

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

Paragraph  Policy  Policies Map

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

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

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

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

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

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

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

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

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

We are disappointed that determination has been made for the possibility of very tall buildings up to up to 63m – 82m already permitted (W12) 54m - 61m already granted (W2), 53m (C7), 52m (C2) and 40-45m (Allocations C3, 10, 11,13, 14, 15, 23 We consider these heights excessive in this part of London as we gradually move away from the centre. We consider them damaging for our local residents who view these areas and use them.

**A general comment applying to this whole process: We do feel comments made in earlier submissions in this Local Plan process have not been taken on board. Our members enjoy the environment they live in and are desperately concerned at the erosion in favour of inevitably very tall, large-scale developments and monolithic developments replacing the richly varied patchwork that has grown organically instead of smaller human-scale and that we end up with an environment created by developers riding rough-shod over the local community who end up feeling disempowered and alienated. They have to live with the mess created by developers. Residents would hope that expert planners would have a role in protecting communities from the worst of the harms but due to the processes of development with secret pre-application meetings things often seem pre-determined in favour of the developer without any real notice taken of the communities. This is especially true with large-scale development with dozens of complex technical documents and expensive consultants representing developers vs. the thin resources of amateur local groups trying to understand the schemes and trying to resist the worst of the harms. Also properly informing planning committees seems to be sadly missing.**

The views from our open spaces are especially valuable, vitally important for our mental health and as high rise encircles their realm, diminished their effect and increases the stress of the encroaching city hemming in nature. The views from our streets are also important and very tall buildings can close views and give an oppressive feeling to a neighbourhood, out of context with the generally humane scale of the existing historic fabric. They create a negative, alienating and overbearing presence, a reduction in daylight and sky-views, with increased night-time light pollution, overshadowing, wind tunnels, loss or spoilt long views, masking or loss of local landmarks, resulting in visual disorientation, loss of individual local character and 'grain', genericization of place, flattening of topographical differentiation, loss of context with local areas, crowding out and diminishing the impact and importance of existing buildings. This all adds to urban stress and a sense of alienation and fear and a loss of identification with a place and a lack of belonging .

This is in contrast to many of the high-quality lower rise but high density housing schemes of the recent past (largely under Sidney Cooke's time as Camden's Borough Architect). This type of innovative solution may provide a much better quality of life for residents and locals and should be explored and sites set aside for experimentation rather than simply going for height which will destroy areas in perpetuity.

We are surprised and disappointed the highly significant new 100 Avenue Road development (W12), on the border of area C, has not been given any detailed consideration in this plan. Among other harms, his hugely damaging scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major omission. The Swiss Cottage Piazza is a central 'place' in our community with daily food stalls and a weekly Farmers' Market as well as vital

pedestrian and cycling routes, entrance to the Swiss Cottage Open Space and a popular play area for children and resting and meeting place for theatre goers and 1000+ students attending the adjacent Royal Central School of Speech and Drama

(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.

1. Tall buildings need far more meaningful consultation. It needs a better, more consistent and objective testing on the community affected with better and more realistic visualisations from differing street level viewpoints rather than fanciful developers' idealised representations

(PS the box below does not work)

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(Continue on a separate sheet if necessary)

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

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

No

Yes

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

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

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

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

**Privacy Notice**

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

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

<b>11. Signature:</b>	<b>Alan Selwyn</b>	<b>Date:</b>	<b>27.6.25</b>
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**Part B – Please use a separate page for each representation**

Name or Organisation: **The Belsize Society**

**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

W12

Policy

Policies Map

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

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

(3) Complies with the Duty to co-operate

Yes

No

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

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

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

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

We are surprised and disappointed the highly significant new 100 Avenue Road development at Swiss Cottage (W12), on the border of area C/W, has not been given any detailed consideration in this plan. Among other harms, his hugely damaging scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major omission. The Swiss Cottage Piazza is a central ‘place’ in our community with daily food stalls and a weekly Farmers’ Market as well as vital pedestrian and cycling routes, entrance to the Swiss Cottage Open Space and a popular play area

for children and resting and meeting place for theatre goers and 1000+ students attending the adjacent Royal Central School of Speech and Drama.

The permitted development will cause the vast majority of delivery and service traffic to cut across this busy pedestrian space and cause considerable harm. This will need serious consideration which was not accorded at the design, application stage or consent stages: it has been seriously overlooked.

The fact that this 'place' has not been recognised more emphatically in this Local Plan is a deficit. The importance of this area should be recognized and would raise the necessary mitigations higher up the agenda.

(Continue on a separate sheet if necessary)

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

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

The importance of this area should be recognized and would raise the necessary mitigations higher up the agenda.

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(Continue on a separate sheet if necessary)

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<b>11. Signature:</b>	Alan Selwyn	<b>Date:</b>	27.6.25
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**Part B – Please use a separate page for each representation**

<b>Name or Organisation:</b> The Belsize Society
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Paragraph  Policy  Policies Map

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

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

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

We note 11.11 and wish the council to develop a more coherent and rigorous policy in order to more actively resist development in gardens. We don't think enough has been written into this plan to protect this valuable asset when more and more development and degradation appears to be taking place without necessary control mechanisms.

The Plan acknowledges the importance of gardens - *Gardens help shape their local area, provide a setting for buildings, provide visual interest and often support natural habitats. Therefore, they can be an important element of the character and identity of an area (its 'sense of place') and its biodiversity.*

Gardens are incredibly valuable spaces for increasing not just biodiversity but providing wildlife corridors to create wider networks, improving air quality, carbon sequestration, mitigating urban heating and effects of climate change, cooling during heat waves, reducing flooding risk, healthy food production, reducing sound and light pollution, aiding good mental and physical health and of educational and cultural value, especially for children.

We welcome the commitment to resist development that occupies a disproportionate amount of a garden, *notwithstanding permitted development rights*, but "disproportionate" should be defined and the policy should be consistently applied going forward.

With the exception of the restriction in permitted development rights for disproportionate garden structures referred to above, the draft Plan puts forward no specific proposals or practical measures as to how gardens will be protected.

Insufficient recognition is given to the importance of the back gardens of houses and blocks of flats; such gardens are often highly valued by the residents of flats which overlook the gardens, even if they do not have access to those gardens.

'Garden rooms' are currently in vogue and can be of considerable size and very sophisticated yet economical form of effectively (and cheaply) extending a house. They use up excessive space in the garden at the expense of planting, can damage tree roots, contribute to light pollution, noise and loss of visual amenity to neighbours.

Too many gardens are being paved or concreted over to be used as external 'rooms'. Loss of permeable surfaces increases flooding risk.

These external spaces usually comes with harsh floodlighting causing light pollution. We believe all external lighting in gardens should be subject to regulation.

We believe 'garden rooms' should be subject to strict controls, possibly through Article 4 Directions and similarly on all forms of hard landscaping to restrict to certain proportions of the area and a requirement for permeable surfaces.

We applaud the intentions in 11.16, to retain important views and gaps. It is important not only to retain the protected views but to protect all views from the increasingly intrusive high tower blocks which are popping up everywhere and which lead to a loss of views, perspective, sky, horizon and landmarks which locate a place.

(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.

1. We believe 'garden rooms' (beyond a basic 3msq 'shed' size) should be universally subject to strict controls, as Policy and possibly through Article 4 Directions
2. similarly on all forms of hard landscaping to restrict to certain proportions of the area and a requirement for retention of permeable surfaces.
3. Requirement for external lighting to be controlled

4. It is important not only to retain the protected views but to recognize the value of longer views and access to views of sky and trees and to protect these amenities.

(Continue on a separate sheet if necessary)

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<b>11. Signature:</b>	Alan Selwyn	<b>Date:</b>	27.6.25
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**Part B – Please use a separate page for each representation**

<b>Name or Organisation:</b> The Belsize Society
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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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(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)

x

(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

x

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Where significant development takes place near mature trees, inspections should take place for the following two growing seasons to assess root damage, which often seems to be the result, even though protection appears to be used.

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

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

#### **TPO and other trees**

It is encouraging to see that the draft Plan acknowledges many of the benefits of trees:

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

The draft Plan emphasises *trees and vegetation of significant amenity, historic, cultural or ecological value*, i.e. trees with, or potentially worthy of, TPO protection. Camden does need to be more rigorous in ensuring that, in the rare circumstances where TPO-protected trees need to be felled, replacement planting of trees of equivalent value takes place or, if that is not possible, that a financial

contribution is obtained to finance replanting by Camden Council in a nearby location.

However, trees subject to or worthy of TPOs already have reasonable legal protection. In contrast, little protection is afforded to the huge numbers of trees in Camden that do not have significant amenity value but nevertheless are vitally important to the character of their neighbourhoods and in providing wildlife habitat and biodiversity, offering shade and cooling, and filtering pollutants from the air. Trees in back gardens may have low amenity value but make a significant contribution to abatement of air and noise pollution and to wildlife habitats and biodiversity.

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

All tree works in CAs need to be notified to the Council in advance and approval sought, but generally Tree Officers will only object to the felling of a tree in a CA on the grounds that the tree satisfies the criteria for being granted a TPO. Trees in back gardens may have little ‘amenity value,’ according to standard arboricultural calculations, if they are not visible from the public domain (regardless of their value to residents of surrounding buildings). Tree Officers repeatedly state that they are unable to attribute sufficient value to factors such as protection against air and noise pollution or to trees as wildlife habitat promoting biodiversity, to make a difference to the calculation of the tree’s total amenity value. The draft Plan acknowledges the exceptional importance of green corridors of trees and vegetation in back gardens in providing *important wildlife corridors within the urban environment*, and the Plan should give specific protection to such green corridors. At present such green corridors are being steadily eroded from month to month by the felling of individual trees, with no weight attributed in the decision-making process to the cumulative effect of such fellings. If Camden does not include protection in the new Plan, many of today’s remaining green corridors simply will not exist in five years’ time.

### **Increasing canopy cover in Camden**

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

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

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

### **Trees/green space and developments**

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

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

(Continue on a separate sheet if necessary)

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

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1. Camden should adopt a "non-standard" method of valuing trees more appropriate to an urban setting than that currently used.
2. Similarly, the draft Plan acknowledges the importance of gardens as green spaces in densely populated areas but requires more rigorous measures to preserve and protect them.
3. the Plan should give specific consideration and protection to green corridors and to develop new green corridors where opportunities exist.
4. Stronger protections are needed for the vast number of trees in Camden that are not eligible for TPO status, particularly in back gardens.

5. Clearer statistics and visualisations are needed to help understand the changing nature of Camden's tree canopy from year to year.
6. the draft Plan needs to provide for an improved system of control and enforcement to ensure that developments fulfil planning stage commitments about trees and green spaces.

(Continue on a separate sheet if necessary)

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<b>11. Signature:</b>	Alan Selwyn	<b>Date:</b>	27.6.25
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**Part B – Please use a separate page for each representation**

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Paragraph	<input type="text"/>	Policy	<input type="text" value="SC4"/>	Policies Map	<input type="text"/>
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

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

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

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We are concerned about SC4 (B1), (B2) and (B4) as it is all too easy to apparently ‘justify’ changes to open spaces and once lost or degraded will be in perpetuity. We welcome the plan protecting existing open spaces and ensuring that new development contributes through new provision, improvements, and green infrastructure. The focus on play & wellbeing, particularly for children and older residents, is good.

The Council classifies parts of Belsize as being more than **280 m walking distance** away from multi-functional open spaces (larger than 0.25 ha) — placing it within an **open-space deficiency zone** (CPG Public Open Space 2021). This means many residents who are living in flats without gardens are distant from high quality green spaces, especially from the perspective of children’s walking to play.

The plan is very much focused on areas that are to be developed, without specifics **for areas where no new housing is envisaged**. There is therefore not much said about how open space deficiency zones such as ours will be improved. Could the plan include easier routes to secure and then deliver investments in open space investments outside of new housing developments?

We have two experiences in relation to this. The Belsize Streatory provides a good community use of space, but the scale of public investment alongside is modest and could be used to improve that space. Also, our recent involvement in placing more trees and benches in the Eton Avenue/Lancaster Grove triangle funded by CIL proved complicated to secure and very difficult to deliver.

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Paragraph  Policy  Policies Map

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(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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We note (7.18) the 1,652 long term vacant homes in 2024 and strongly support Camden to look at more immediate and effective ways to reduce this number and to look at creative ways to enforce the use of investment homes (7.20). Also, we urge the council to explore methods of better regulation of short-term visitor lets such as AirB'n'B and returning them to the permanent home market (7.22 and 9.76) as these are not only damaging local communities and driving up prices but also very harmful for immediate neighbours.

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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We think there should be strong policies to drive the council towards mechanisms to ensure empty homes are filled in a timely and consistent fashion and short term lets are reduced in favour of longer tenures.

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Paragraph  Policy  Policies Map

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x

(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

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– we have some concerns on the siting of heat pumps where there are very small outside spaces which can create considerable and persistent, though often low level, noise nuisance with adjacent neighbours which can cause considerable distress. Remedial actions can be difficult once installed and the acoustic measurements methodology and regulations are often not sufficiently sensitive or attuned to deal with individual non-standard sites and we would like planners to take special note of this.

We are also concerned about the proposed removal of Article 4 Directions on PV panels in the conservation area, which is under current consultation.

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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1. We would like policy amendment to state that each application requires special consideration and due to the heterogenous and dense nature of our area with many converted properties, the standard ways of measuring noise and vibration and visual nuisances, for instance, will not necessarily protect neighbours from harm and more subtle assessments will be needed.
2. We would like specific expertise to be available in the council to advise applicants before submission and neighbours seeking advice on

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Paragraph	<input type="text"/>	Policy	<input type="text" value="DS1"/>	Policies Map	<input type="text"/>
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(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
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- |   |   |
|---|---|
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We are supportive of this policy but wish to record that DS1 (A1) must be adhered to: currently it is frequently not and new buildings are often consented that are out of scale, not “of the highest design quality” and do not “respect and respond to local context”.

We also look forward to seeing Policy DS1 (A8) acted on to provide “new open space”.

As a local residents’ representational group we look forward to engaging with Citizen Scientists, DS1 (B).

We are surprised and disappointed the highly significant new 100 Avenue Road development at Swiss Cottage (W12), on the border of area C/W, has not been given any detailed consideration in this plan.

This is an example of a scheme which in no way respects or responds to the local context.

Among other harms, his hugely damaging scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major omission. The Swiss Cottage Piazza is a central ‘place’ in our community with daily food stalls and a weekly Farmers’ Market as well as vital pedestrian and cycling routes, entrance to the Swiss Cottage Open Space and a popular play area for children and resting and meeting place for theatre goers and 1000+ students attending the adjacent Royal Central School of Speech and Drama.

The permitted development will cause the vast majority of delivery and service traffic to cut across this busy pedestrian space and cause considerable harm. This will need serious consideration which was not accorded at the design, application stage or consent stages: it has been seriously overlooked.

The fact that this ‘place’ has not been recognised more emphatically in this Local Plan is a deficit. The importance of this area should be recognized and would raise the necessary mitigations higher up the agenda.

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wish to record that DS1 (A1) must be adhered to and the wording should be strengthened to make it less aspirational and more real: currently it is frequently not and new buildings are often consented that are out of scale, not “of the highest design quality” and do not “respect and respond to local context”.

We also look forward to seeing Policy DS1 (A8) acted on to provide “new open space”.

As a local residents’ representational group we look forward to engaging with Citizen Scientists, DS1 (B).

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

(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	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"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="x"/>
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(4) Consistent with national policy	<input type="text"/>

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These neighbourhood centres which are of vital importance to communities and we fully support each part of this policy, particularly in relation to the 4 Neighbourhood Centres identified in this area. We also hope to retain the small local businesses that make our area so lively and resist some of the chains which decrease diversity and push up prices for local businesses. The changes to Class E licensing make it harder to specify uses for commercial premises. We have concerns about some retail units recently becoming educational use and gym / massage services, presenting a loss of retail and a 'blind' front to the shopping street. We hope the council might find a way to retain a balance of businesses – also especially pertinent when many estate agents open close together. We wish the council to resist applications for metal security shutters and grills which create a hostile visual environment.

We also wish to see protection from small units being merged into larger ones which will bias uptake to wealthier incoming chains.

We are surprised and disappointed the highly significant new 100 Avenue Road development at Swiss Cottage (W12), on the border of area C/W, has not been given any detailed consideration in this plan.

Among other harms, his hugely damaging scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major

omission. The Swiss Cottage Piazza is a central 'place' – properly a 'Neighbourhood centre' - in our community with daily food stalls and a weekly Farmers' Market as well as vital pedestrian and cycling routes, entrance to the Swiss Cottage Open Space and a popular play area for children and resting and meeting place for theatre goers and 1000+ students attending the adjacent Royal Central School of Speech and Drama.

The permitted development will cause the vast majority of delivery and service traffic to cut across this busy pedestrian space and cause considerable harm. This will need serious consideration which was not accorded at the design, application stage or consent stages: it has been seriously overlooked.

The fact that this 'place' has not been recognised more emphatically in this Local Plan is a deficit. The importance of this area should be recognized and would raise the necessary mitigations higher up the agenda.

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1. We hope the council might find a way to retain a balance of businesses
2. We wish the council to make it policy to resist applications for metal security shutters and grills which create a hostile visual environment.
3. We also wish to see policies protecting small units from being merged to form larger ones

---

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– we fully support this though there is conflict between these aspiration and those of tall buildings.  
Community engagement ,12.21-12.23, currently often seems a tick-box exercise and is often perfunctory or poorly advertised, overly controlled and limited in time with narrow pre-set options giving the indication schemes are pre-determined. Such consultation should be managed by an independent organisation, rather than the developer, using standardised, validated methods with full reporting of the precise

questions asked, the issues raised, the depersonalised data including full demographics and all the responses included in the results, positive and negative with a proper statistical analysis. All too often the results of consultations are vague and unsupported by data with simple selective quotes being used to support the development. The consultation as presented by the developer often appears to be accepted unchallenged by the planners.

12.26 – it is often unclear what and who the Design Review Panel is and its role and levels of influence. Is it independent? How much is it listened to? Can local groups be involved?

There is no mention of post-build servicing and delivery arrangements and a credible plan needs to be produced and verified as fit for purpose.

An excellent example is the new approved scheme for 100 Avenue Road. Among other harms, this hugely damaging scheme will destroy an important and heavily used pedestrian piazza and we feel consideration of this is a major omission. The Swiss Cottage Piazza is a central 'place' in our community with daily food stalls and a weekly Farmers' Market as well as vital pedestrian and cycling routes, entrance to the Swiss Cottage Open Space and a popular play area for children and resting and meeting place for theatre goers and 1000+ students attending the adjacent Royal Central School of Speech and Drama.

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1. There need to be stronger policies on developments having better post-build servicing and delivery arrangements and a credible plan needs to be produced and verified as fit for purpose.
2. More honest and rigorous consultations with independent verification and reporting of statistically validated reports is needed.
3. A clarification of the composition, role and process of the Design Review Panel is needed

(Continue on a separate sheet if necessary)

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

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many new developments, especially rear extensions, have huge areas of glazing and with modern harsh lighting which causes light pollution and many of the developments are open plan with hard surfaces and widely opening folding doors to balconies or the garden which leads to sound pollution. External lighting is also common and gardens are now commonly used as 'outside rooms', often with barbeque kitchens which leads to considerable noise nuisance and cooking smells. These harms can be particularly troubling in many of the properties with very small gardens and close proximity of houses and extra guidance and consideration should be given at the planning stage.

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More sophisticated consideration of the effects of the completed development on neighbouring properties and the natural environment is needed and this needs enshrining in policy

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(Continue on a separate sheet if necessary)

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Cycle priority schemes and lanes must be more consistent in their design – currently the inconsistencies in design and signage for cyclists and drivers leads to safety problems.

Dockless hire bikes and e-scooters require greater regulation and managing to avoid being left on pavements and roads, obstructing pedestrians and causing hazards to road users.

Pedestrians and other road users are troubled and placed at risk by reckless use of, particularly hire e-bikes and scooters, and regulations and enforcement are needed as these become even more widespread and this should be backed by policy.

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Policies are needed on the enforcement of safe use and parking of dockless hire bikes and scooters.

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Acoustic reports often fail to support the subjective story of a neighbour experiencing low level long-standing noise nuisance.  
Food noise is often associated with repetitive motorcycle deliveries.  
Plant noise, for instance air cooling or heating can be very annoying when situated close to neighbours in tightly-packed areas when the standard rules might not be adequate.  
Delivery management can be impossible to manage precisely with multiple deliveries from multiple providers to multiple flats. There are large increases in home deliveries due to the rapid growth in online shopping.

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Specific policies need to recognise the changing pattern of life and plant/equipment and the nuisance they can present to communities and individuals.

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Where a basement development has been permitted, any new application within a certain distance of the same or adjacent streets should be coordinated to reduce the effects on neighbours which can go on for two years, such as daily noise and vibration nuisance (drilling and excavating), dirt, lost car parking spaces, road blockages.

Basement extensions are fundamentally environmentally damaging employing massive energy requirements to excavate, export the spoil using hundreds of lorry movements, underpinning and construction with vast volumes of concrete, effect on ground-water and require pumps and these environmental costs needs better quantifying in applications with more generous S106 agreements to spend in the local vicinity to mitigate some of the harm and prolonged inconvenience to neighbours during the lengthy construction.

The ongoing effects of the completed basement extension are rarely cited in application determinations yet can be hugely damaging for neighbours include loss of significant areas of front and rear garden space and habitat and planting due to lightwell excavation and associated concrete retaining structures. Most of these extensions include large glazed areas, often with folding doors and this coupled with hard surfaces will cause increased sound projection magnified by the amplifying horn effect of the lightwell and increased light pollution.

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.

1. Where a basement development has been permitted, any new application within a certain distance of the same or adjacent streets should be coordinated to reduce the effects on neighbours – policy needed.
2. More generous S106 agreements needed to mitigate some of the harms suffered by neighbours of basement conversions with the sums hypothecated to make improvements to that immediate area (not just to repair damage caused)

3. Policies to support planners should look at the effects of the completed scheme in terms of changing the local conditions – sound, light, visual intrusion, loss of habitat etc.

(Continue on a separate sheet if necessary)

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

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

No

Yes

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

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<b>11. Signature:</b>	Alan Selwyn	<b>Date:</b>	27.6.25
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**Part B – Please use a separate page for each representation**

<b>Name or Organisation:</b> The Belsize Society
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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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)

(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)

x

(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

x

(4) Consistent with national policy

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

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

Where roof extensions are permitted, attention should be given to maintaining the historical roofscape, avoiding squaring everything off and maintaining gables, eaves, pediments, ridge-tiles, decorative features and chimneys and so on that are a feature of many of our streets.

Often these features are glossed over on the application and busy planners will not know the specific details of every area and type of building and the condition of the building in question.

Too many roof extensions are disproportionate and do not respect the host building.

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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1 Policy should state that a proper survey with good photographs of the existing and neighbouring structures be carried out paying attention to the characteristic visual features which need protection and/or restoration as a condition of planning consent.

2 Better understanding and clarification of the effect of any intervention needs demonstrating

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(Continue on a separate sheet if necessary)

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we emphasise the need for full objective appraisals of need for mechanical cooling and that other avenues have been properly explored and challenged, particularly in the case of owner-commissioned assessments which are often seemingly unreasonably favourable towards the commissioner at the expense of neighbours.

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We think there needs to be independent justification of the need for mechanical cooling systems

(Continue on a separate sheet if necessary)

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## Notes to accompany the Representation Form

### 1. Introduction

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

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

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

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

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

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

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

### 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector

has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

#### **4. General advice**

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

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

Responder 512

Date: Fri, 27 Jun 2025 12:10:32 +0000

From: Mark Furnish

To: PlanningPolicy

Subject: Camden Local Plan - Proposed Submission Draft

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Dear Planning Policy Team,

**CAMDEN LOCAL PLAN - PROPOSED SUBMISSION DRAFT**

Thank you for consulting Sport England on the above.

As I am sure you are aware, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to give significant weight to the benefits of sport and physical activity including ensuring developments enable people to lead active lifestyles, protect sports facilities from loss as a result of redevelopment, enhance existing facilities through improving their quality, accessibility and management and to provide new facilities that are fit for purpose and meet demands for sport participation and physical activity now and into the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport>

Sport England have reviewed the Local Plan in light of these planning objectives, National Planning Policy set out in the National Planning Policy Framework (NPPF) and its comments submitted relating to the Regulation 18 consultation (attached) and has concerns that the document is not sound. Sport England will elaborate on this position and highlight other comments below:

Evidence Base

As highlighted in Sport England's comments to the Regulation 18 Local Plan consultation, the London Borough of Camden does not have up-to-date and robust assessments of needs and strategies relating to sport facilities, such as a Playing Pitch Strategy, Indoor/Built Sport Facility Strategy or similar. The sport and recreation facility evidence base that has informed the Local Plan is the Open Space, Sports and Recreation Study (2014), Indoor Sports and Leisure Facility Study (2015) and the Euston Area Plan Sports Needs Assessment (2022). Although the latter could be argued is up-to-date, which Sport England would question given it does not appear to have been reviewed or updated since it was drafted, it only focuses on a specific area of the Borough. Both the Borough wide studies were drafted in excess of ten years ago and both documents clearly state that it addresses the period up to 2025. These studies are clearly out-of-date consequently the Local Plan, in relation to sport facility needs/provision, is not supported by robust evidence.

The NPPF, at paragraph 103, states that "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." The Local Plan, in relation to sport facilities, does not meet this requirement consequently it is not positively prepared, justified and consistent with national policy therefore it is not sound.

Policy SC3 - Social and Community Infrastructure

Sport England's comments previously made in relation to Policy SC2 (now SC3) are still applicable. Related to the above, the policy at C. 1. indicates that improved and extended social and community infrastructure that meet the needs of intended users will be supported however it is not clear how that would be possible in relation to sport facilities without up-to-date and robust strategies/evidence. To reiterate the point regarding Policy SC3 D 1. b. (Policy SC2 D. 1. b. previously), this is contrary to the NPPF, paragraph 104, in relation to sport facilities as previously explained. Marketing is not an assessment of need and demand so providing evidence of marketing and vacancy evidence for a twelve month period does not meet the requirements of the NPPF (paragraph 104 a). Sport England would like to highlight that the National Planning Policy Guidance, at Paragraph: 002 Reference ID: 37-002-20140306, directs Local Authorities and developers to Sport England's guidance on how to assess the need for sport and recreation facilities which does suggest what the Government considers this appropriate for an assessment of need to decide what is surplus. Furthermore, Policies SC3 and SC4 could potentially be at odds since Policy SC4 1. b. does require open spaces, which includes playing fields (a community facility), to be protected unless "an assessment has been undertaken which has clearly shown the open space or land to be surplus to requirements;" (and other criteria). This reflects the requirements of the NPPF, paragraph 104. Sport England, therefore, does not consider that Policy SC3 is sound as it is not consistent with national policy.

#### Policy SC4 - Open Space

Policy SC4 (previously SC3) appears to have been reconsidered which is welcomed however Sport England is still concerned that the policy will only protect all designed public and private open spaces as shown on the Policies Map which may not have included all the outdoor sport and recreation facilities in the borough (noting that paragraph 10.65 indicates that such facilities are considered open space). The plan being silent on non-allocated facilities could result in the lack of protection, which is contrary to the NPPF, paragraph 104, given that no site can be considered surplus at this stage as the Council do not currently have up-to-date and robust sport facility assessments informing the Local Plan.

In terms of new provision, the Local Plan uses a standards approach to new provision (Paragraph 10.80 and Table 11). A standards approach has its limitations in sport facility planning as it does not reflect local need for a specific area and could result in facilities that are not suitable to meet local needs. Furthermore, given the lack of evidence in relation to sport facility provision, the standards approach proposed is not robust as it is not clear if the level of open space stated would be sufficient to meet the local sporting need generated from the development, as an assessment of local sport demand and supply would need to inform such an approach. Sport England has a Sports Facility Calculator and a Playing Pitch Calculator that can calculate demand generated from a development and what that translates to in sport facility provision, albeit the latter does require an up-to-date and robust Playing Pitch Strategy. Sport England, therefore, contends that in relation to the sport facility provision using the proposed standards approach is not justified.

#### Other Comments

Not all of Sport England's previous comments have been incorporated within the Local Plan and Sport England would encourage that this is reconsidered. It does,

however, welcome that there is reference to sports facilities in the Strategic Objectives and there is reference to Active Design Guidance.

Conclusion

Sport England objects to the Local Plan as it does not consider it to be positively prepared, justified and consistent with national policy therefore it is not sound. This, however, can be addressed if the Council develop a robust and up-to-date evidence base for sport and recreation facilities that informs the Local Plan policies and reword some Policies to align with the NPPF, particularly Paragraph 104.

If you have any questions or would like any further advice, please do not hesitate to contact me.

Yours Faithfully,

**Mark Furnish**

[Redacted signature]

[Redacted signature]

E: [redacted email]

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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

Dear Planning Policy Team,

Thank you for inviting Sport England to comment on the above document.

## **INTRODUCTORY COMMENTS**

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

Sport England has assessed this consultation in light of Sport England's Planning for Sport: Planning for Sport Guidance ('Guidance'). The overall thrust of the Guidance is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

**PROTECT** the right opportunities in the right places

**ENHANCE** opportunities through better use of existing provision

**PROVIDE** new opportunities to meet the needs of current and future generations.

Sport England's aim in working with the planning system is to help provide active environments that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active. The importance of sport should be recognised as a key component of local plans, and not considered in isolation.

The following comments are provided within the context of:

- The National Planning Policy Framework (DCLG, 2023).
- Sport England's Planning for Sport webpages including Planning for Sport Guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

## COMMENTS ON THE DRAFT CAMDEN LOCAL PLAN (REG 18)

### Section 1 – Vision and Objectives

Sport England supports the ambitions set out with in the Local Plan. Tackling inequality aligns with Sport England's values and behaviours outlined within [Uniting the Movement](#).

Uniting the Movement is Sport England's 10 years vision to transform lives and communities through sport and physical activity. It sets how Sport England need to change as a sector and an ecosystem, so that we can give people the opportunities they need now and in the future. More than anything, it seeks to tackle the inequalities we've long seen in sport and physical activity. Providing opportunities to people and communities that have traditionally been left behind, and helping to remove the barriers to activity, has never been more important.

### LB Camden Strategic Objectives (page 17)

To promote healthy and inclusive communities in line with paragraph 102 of the National Planning Policy Framework (NPPF), reference should be made to the importance of improving access to sports facilities. Sport and recreation can play an important part in achieving these ambitions which could be achieved by revising the strategic objectives as set out in the table on pages 16/17

'To promote health and well-being and reduce physical and mental health inequalities through good design and place making; improving access to nature; enabling affordable healthy food choices; supporting people to lead healthy and active lifestyles; and improving access to healthcare **and sport facilities.**'

We make Camden ambition – 4, 6  
Local Plan Policy DS1, SC2, SC3, D1

### Policy DS1 (vii)

Sport England supports Policy DS1 (vii) that the council will seek to deliver healthy and sustainable development by 'providing new open space, and opportunities for play, recreation and sports'. However, it is of concern that other than a site allocation (N2) which impacts on an existing sports facility, the site allocations do not identify any locations for new sport/community facilities. Nor is it clear what will be provided within the development site allocations set out in the plan. We have made further comments in our response to policies SC3 about the need to

update the Council's evidence base to identify the Borough's need for open space, sport and recreation facilities.

## **Design**

Paragraphs 2.23 – 2.26 recognise the importance of design in being key to delivering healthy and sustainable development. Sport England, with support from Active Travel England and OHID, has produced 'Active Design' <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design> a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with section 8 of the NPPF. Good proactive planning and design should create environments that make taking part in sport and being physically active an easy and attractive choice for people and communities (Active Design Principle 3 (AD3)). Early attention to providing for sport and physical activity in the masterplanning and design of developments will help to ensure this is the case and secure greater opportunities for people to lead healthier and more active lifestyles (AD10). Active environment, including playing fields, should be an important consideration when choosing an area for housing growth. Sport England recommends that Active Design is recommended for use by developers within the Local Plan.

### **Allocation N2 (IDS12) – Mansfield Bowling Club**

Sport England objected to the loss of this bowling club and impact on this site but unfortunately the planning inspector subsequently approved the development of the site (Planning Inspectorate Reference; APP/X5210/W/16/3153454). Sport England supports the Council's intention to secure reconfiguration and extension of the tennis courts to provide an additional court and increased playing area consistent with the previous approved planning applications and Lawn Tennis Association requirements. Please contact Sport England if you require further information about current LTA requirements.

### **Note on site allocations**

Please note that if Sport England has missed any sport facilities that falls within any land allocation, then this does not mean the facility is surplus to current or future need. As stated in the NPPF, sport facilities should be protected unless they

are surplus to current or future needs, replaced or lost to another sport facility the benefits of which outweighs the harm caused by the loss.

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered through planning obligations or CIL. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has or will have in place (see further comments on Policies SCI, SSC3 and Appendix 1 below).

### **Policy CC5 – Energy reduction in existing buildings**

The intention within policy CC5 to address the climate emergency is good in principle. However, this appears to apply to a wide range of developments and even small extensions. There is a concern that it may dissuade some sports clubs and community groups from making much needed changes to their buildings due to the associated cost. This may lead to buildings remaining in a poor state when amendments and extensions are much needed by the community. The Council should consider carefully how the policy would work in practice and whether some exemptions should be made to assist sports and community groups looking to improve their facilities.

### **Policy CC6 Energy reduction in new buildings**

As with policy CC5 the Council should consider carefully whether;

- 1) This policy accords with national planning policy and guidance;
- 2) If it contains sufficient information to cover all types of uses (it currently doesn't mention sport facilities or community buildings or have any guidance specific to those uses);
- 3) If the monitoring requirement (vi) is reasonable and how this will work in practice.

It is noted that the London Plan requires major development to report on energy performance following completion of the development, but more information and guidance is required within the policy to help applicants who are progressing applications for minor development and may not be able to afford or have the knowledge to address the requirements set out in the policy.

## Policy SC2 – Social and Community Infrastructure – page 284

Sport England recommends amendments are made to Policy SC2.

C) viii) requires an applicant to demonstrate that *'funding arrangements are secured for the future maintenance and management of the facility.'* It is welcome that the Council is seeking to address the issue of community facilities falling into disrepair because of a failure to manage and maintain them adequately. However, many community facilities are only kept going because of volunteers giving up their time or through other mechanisms such as fundraising or crowdfunding and the community volunteers who seek to apply for funding to secure a facility's longevity. Given the lack of certainty associated with these methods, applicants may struggle to demonstrate to the Council how they will achieve, this.

For example, C (vii) following is also good to encourage but could add significant costs to a project which will already be difficult to make viable due to local plan policies elsewhere in the Local Plan that have costs associated with them, albeit it is note that the policy has caveats. More information about how this will be assessed may be needed in the plan or the above may be more appropriate to include as guidance outside of the Local Plan.

Sport England supports the intention of policy (D) to safeguard social and community infrastructure. However, Sport England objects to the policy until the following changes are made;

- a) a replacement facility of a similar nature is provided ~~or exists~~, that meets the needs of the local population, ~~off~~ its current, or intended, users;

Reason: Paragraph 10.19 explains that this policy applies to indoor and outdoor sports and recreation facilities. Paragraph 103 of the NPPF explains that should not be built on unless one of three of tests are met. The wording of D (i)(a) should be clear that a replacement facility provided. As written the wording 'or exists' indicates that if a similar facility is located elsewhere in the Borough this test could be met. That approach is not consistent with the NPPF.

Sport England also objects to D(i)(b) as it applies indoor and outdoor sports and recreation facilities. This also does not accord with the 3 tests set out in national policy (paragraph 103) which do not reference viability. The policy as worded may make it more difficult to protect facilities from loss or secure their replacement. The NPPF also requires (paragraph 103 –(a)) applicants to produce an evidenced assessment, which is not a requirement set out in this policy.

It is suggested that the policy is amended in line with national guidance or a separate policy covering indoor and outdoor sports facilities is provided.

### **Open space**

Sport England has concerns with paragraph 10.47 as it seeks to rewrite the definition of open space. NPPF Annex 2 defines open space as;

*'All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.'*

Open space can be in private or public ownership,

### **Policy SC3 – Open Space**

Sport England is concerned that the definition of 'public open space' provided, the Policy SC3 and the open space map (not found within the consultation documents) may not identify all the sports facilities (e.g. playing fields, games courts, MUGAs etc) that require protection from development. School and higher education sites can be considered private or public open space depending upon their ownership and out of hours access is often agreed with community groups, rather than the whole site being publicly accessible.

Sport England requires Policy SC3 to be reviewed to ensure that all sport and recreation facilities are protected from development regardless of whether they are in public or private ownership and ensure that the policy and the supporting text aligns with national and regional policy.

For example, Policy SC3 (B) (vi) also does not accord with national policy (NPPF Paragraph 103) or London Plan Policy S5, development for open spaces for sport and recreation facilities is allowed provided the benefits of which clearly outweigh the loss of the current or former use. An up-to-date needs assessment is not required to support this, that is a separate criterion in the policy.

Policy SC3 (D) is about the design and management of public open space. Sport England supports the intention of the policy but queries whether all the criteria can be met on one piece of public open space. Whilst this approach makes some sense to apply to new open spaces created within development, the policy also applies to 'enhanced' open spaces. It is suggested that the policy applies to new areas of open space or a criteria is used so that minor developments are not

captured by the policy? For example, where a tennis court was being enhanced/extended would this be required to meet all these criteria?

Sport England objects to paragraph 10.57 (sports and recreation) and considers this should be removed as it appears to contradict national guidance in paragraph 103, which refers to 'open space, sport and recreation', all of which should benefit from protection through local plan policies. This paragraph does not reflect national policy (NPPF paragraph 103) which requires local authorities to protect existing open space, sports and recreational buildings and land, including playing fields from development and has clear criteria which is also included in London Plan Policy S5 (C). Playing fields, tennis courts, bowling greens, artificial pitches etc. are all open space under Annex 2 of national policy.

Sport England also has concerns regarding paragraph 10.64 which requires provision for outdoor sports facilities. It is good that the Borough intends to seek some provision for outdoor sports facilities, but we are concerned that the Borough's evidence base is not up-to-date and there may not be adequate plans in place to help deliver provision. The Borough will also need to consider how new development contributes to new indoor sports facilities.

Paragraph 10.67 refers to the Camden Open Space, Sports and Recreation Study (2014). This document is now over ten years old and should not be used to inform a new Local Plan.

Paragraph 102 of the NPPF states that 'Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.' It is recommended that the Council undertakes a new assessment to determine what is needed in the Borough to support new provision and how this will be delivered. This is also a requirement of the London Plan (see Policy S5).

It is appreciated that the urban nature of the Borough the approach required for sports facilities strategies requires adaptation. Sport England would welcome the opportunity to discuss with the Borough how this has been approached in neighbouring Boroughs.

## **Natural Environment – Designated sites**

Paragraph 11.6 indicates that 4 SINCS have been altered on the policies map. As highlighted above I was not able to find the proposals map so have not reviewed the proposed changes. With the next consultation it is important that the council provides the updated proposals map and labels it clearly.

## **Policy D1 – Achieving Design Excellence**

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance (also referenced above) can be used to help with this when developing planning policies and developing or assessing individual proposals. The guidance can be found on our website; <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

A number of London authorities have already referenced Active Design and the Active Design Principles in their Local Plans. It is recommended that this document is included in the list in paragraph 12.6.

## **Appendix 1 – Infrastructure - Leisure and community facilities (28)**

Sport England supports the Council's intention to use CIL to support sports provision in the Borough. However, the use of the 2014 study is not appropriate to inform the new Local Plan. In line with the NPPF paragraph 102, the Council should update the evidence base for open space, sport and recreation facilities and this should include a detailed review of where improvements can be made. The Council should also seek to lead on the delivery of new and improved facilities, rather than relying upon schools and private developers to do this.

### **Proposed new policy/addition**

Appendix 1, Item 28 states that 'Sports provision is likely to be met through extension of opening hours and optimising the use of existing facilities (including shared use agreements) and delivering a more diverse and inclusive sports provision.'

There are no policies in the plan to help achieve or support this intention. Many local authorities (particularly with reference to education sites) include policies

within their plan seeking community use agreements of existing and new sports facilities to secure out of hours use. Please contact Sport England directly and we will provide further information of policies from adopted local plans.

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Kind Regards,

**Vicky Aston**

Planning Manager



Responder 513

Date: Fri, 27 Jun 2025 12:14:33 +0000

From: Tony Suckling

To: PlanningPolicy

Subject: Camden basement planning policy consultation

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# Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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

This form has two parts –

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

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

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

## Part A – Submit only one copy of this

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Tony"/>	<input type="text"/>
Last Name	<input type="text" value="Suckling"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
Organisation	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

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

**Name or Organisation:** A-squared Studio Engineers 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	
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**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	<del>Yes</del>	<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

The restrictions proposed in Policy D6 Basements would have a significant negative impact on my business.

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

(Continue on a separate sheet if necessary)

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

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

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

(Continue on a separate sheet if necessary)

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

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

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

No

No

Yes

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

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

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

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

**Privacy Notice**

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

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

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

<b>11. Signature:</b>		<b>Date:</b>	<b>26<sup>th</sup> June 2025</b>
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

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

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

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

## 3. Soundness

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

- ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

#### **4. General advice**

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

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

Date: Fri, 27 Jun 2025 12:17:55 +0000  
From: Alexander Box  
To: PlanningPolicy  
Subject: Formal objection: Proposed relocation of Regis Road recycling centre to Holmes Road

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

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

Dear Camden Planners,

I am writing to formally object to the proposed relocation of the Regis Road Recycling Centre to Holmes Road, as outlined in the Regis Road Area Guidance (March 2025).

**Unsuitable Location:**

Holmes Road is a quiet residential street adjacent to a conservation area and St Patrick's primary school. The introduction of an industrial facility here would significantly degrade the area's character and residential quality.

**Noise and Nuisance:**

The proposed facility would generate unacceptable noise from skip deliveries, waste compaction, and increased vehicle movement-disrupting the peace of a primarily residential area.

**Environmental and Health Concerns:**

The relocation risks increased odours, vehicle emissions (on a Healthy School Street), fire hazards, and vermin-raising serious public health and environmental concerns.

**Facility Redundancy:**

The Hornsey Street facility is superior in every regard:

- Longer opening hours and more capacity (volume of waste and visitor numbers)
- Reduced queuing and unloading risks
- Underground location with air filtration
- Acceptance of a wider range of waste (e.g. paint, asbestos)
- Higher vehicle clearance (1.85m vs 1.75m)

Its proximity makes relocating the Kentish Town site unnecessary and it would therefore be preferable to both local residents and the developers, Yoo Capital, for the facility to be decommissioned and not replaced.

**Lack of Public Consultation:**

There has been inadequate engagement with residents on this proposal, which warrants further scrutiny and transparency.

Motivation Behind Relocation:

This relocation appears to serve the interests of new residential developments planned for the current Regis Road site. Acknowledging that the presence of a recycling centre would diminish the value of those new properties, it is being effectively "dumped" on the edge of the site-at the expense of the existing residential community on Holmes Road and surrounding streets. This is an unjust and short-sighted planning compromise that prioritises developer profits over the wellbeing of current residents and the students at St Patrick's primary school.

I urge Camden Council to reject the proposed Holmes Road relocation and instead pursue alternatives more consistent with residential and environmental priorities.

Sincerely,  
Alexander Box  
[redacted address] [redacted postcode]

Responder 515

Date: Fri, 27 Jun 2025 13:18:42 +0100

From: [redacted]

To: [redacted]

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

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Dear Sir/Madam,  
I hope you are well.

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

For the reasons outlined below, I believe that the allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. Its allocation is 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.

I have laid out my thoughts below as clearly as possible.

**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 which I personally witnessed. 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. This is an area I am somewhat familiar as my cousin Justin Butler founded a significant anti-flood organisation based out of Brighton called Ambiental and he has appeared on Sky News to discuss the dangers of floods. 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 section of roads is already often logged with major traffic.

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 Constable House and The Etons – 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 significantly 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).

I therefore 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

Yours faithfully  
A Slater

Responder 516

Date: Fri, 27 Jun 2025 12:21:03 +0000

From: Charlotte Fink

To: PlanningPolicy

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

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To whom it may concern,

I am writing as a resident to express my strong objection to the proposed designation of the space east of Constable House as a Gypsy and Traveller site (Site C27) under the Camden Local Plan.

While I fully support the Council's commitment to providing for the needs of the Traveller community, I do not believe this particular location is appropriate. The site in question is already surrounded by residential properties, including Eton Place and the newly developed area near Chalk Farm station. Its limited size makes it unsuitable for the proposed use, and I understand it is in fact smaller than the minimum size Camden itself has recommended for such sites.

In addition, the space borders a main road, a railway line, and an area of consistently high foot traffic. This raises significant safety concerns as well as the loss of green space in an already dense urban area. The proximity to transport links and busy pedestrian routes also increases the risk of disruption, both to the local community and to future site occupants.

Finally, there has been no clear plan presented to address the policing or community impact in the surrounding area. I urge the Council to reconsider this proposal and instead explore more suitable, less congested locations that better serve both the Traveller community and existing residents.

Thank you for your time and consideration.

Kind regards,  
Charlotte Fink