



REF: R00136/IN/EH/MR

BY EMAIL ONLY – planningpolicy@camden.gov.uk

Planning Policy
Camden Town Hall
Judd Street
London
WC1H 8EQ

27 June 2025

Dear Sir/Madam

**REPRESENTATIONS TO DRAFT NEW CAMDEN LOCAL PLAN
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of our client, Unite Group Plc (Unite), to submit representations to Camden's New Proposed Submission Draft Local Plan. Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes to 68,000 students across 153 properties in 23 leading university towns and cities. In London, Unite provide homes to circa 12,567 students across 32 properties with further schemes under consideration at full application and pre-application stages. As such, Unite would like to participate in the consultation, providing comments, evidence and experience to influence the direction of the new policy document.

The deadline for representations is 5pm on 27th June 2025 and it is understood that they will be submitted with the Plan and supporting documents to the government in the Autumn, for examination by a Planning Inspector.

These representations follow prior representations submitted to the Regulation 18 Consultation dated 13th March 2024 and should be referred to.

We have therefore reviewed the document on behalf of Unite and provide comments covering the below policies:

- Policy H9 (Purpose-built student accommodation)
- Policy H4 (Affordable Housing)
- Policy D2 (Tall Buildings)
- Policy IE4 (Affordable Workspace)
- Policy T2 (Prioritising Walking, Wheeling, and Cycling)
- Policy CC2 (Prioritising the retention of existing buildings)
- Policy CC3 (Circular economy and reduction of waste)

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- Policy CC4 (Minimising carbon emissions)
- Policy CC6 (Energy use and the generation of renewable energy)
- Policy CC7 (Heat Networks)

POLICY H9 (PURPOSE-BUILT STUDENT ACCOMMODATION)

Draft Policy H9 states:

- A. *The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.*
- B. *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:*
1. *will not involve a disproportionate loss of self-contained homes (particularly homes with 3 bedrooms), having regard to the overall addition to housing supply;*
 2. *will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing;*
 3. *complies with any relevant standards for houses in multiple occupation and any relevant residential design standards to provide safe, functional, adaptable and accessible spaces, including shared spaces, outdoor amenity space and laundry facilities;*
 4. *includes a range of accommodation to suit students with differing lifestyles and incomes, including cluster flats where possible;*
 5. *for the full duration of all terms in the academic year, will be secured for students at the Council's recognised higher education institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students;*
 6. *will have nominations agreements in place to provide housing for students at one or more recognised higher education institutions, including nominations agreements for any affordable student accommodation incorporated in the development;*
 7. *will be accessible to public transport and will not have a detrimental impact on the transport network;*
 8. *contributes to creating a mixed, inclusive and sustainable community;*
 9. *protects residential amenity in accordance with Policy A1;*
 10. *will be accompanied by a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time;*
 11. *will be managed as a single planning unit; and*

12. provides affordable student accommodation or otherwise provides an appropriate contribution to affordable housing in accordance with Policy H4, particularly Part D.

C. The Council will resist development that involves the net loss of student housing unless:

- 1. either it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing;*
- 2. or adequate replacement accommodation will be provided that satisfies the criteria in Part B above;*
- 3. or it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere;*
- 4. and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace in an alternative permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.*

Unite suggest recommendations to parts B.1 and B.2, B.3, B.12 and C.4, which are detailed below.

Part B.1 and B.2 – PBSA Contributes Towards Housing Supply

The text clearly seeks to prioritise conventional housing development over PBSA. Unite raises a strong objection to this approach for the following reasons:

1. PBSA is recognised within both London Plan policy H15 and national policy as a contributor towards housing supply and therefore a form of housing. National Planning Policy Guidance (NPPG) states the following at para 034 (Reference ID: 68-034-20190722) that *“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply.”* Unite do not therefore consider it sound to restrict concentrations of this housing type specifically.
2. A recent planning decision by Haringey Council (LPA ref. HGY/2023/2306 & HGY/2023/2307 at ‘Printworks’ 819-829 High Road, Tottenham, London, N17 8ER) granted approval for a PBSA scheme and acknowledged that the London PBSA market currently does not come close to providing the amount of accommodation required to house London’s students. The report states that of London’s c.400,00 full time students, c.310,000 students are having to find accommodation outside of this purpose-built sector. The committee report references the supporting text of Policy H1 of the London Plan, stating:

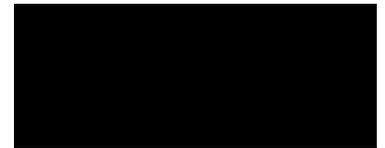
“... non-self-contained accommodation for students should count towards meeting housing

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targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. The proposed scheme would therefore deliver 114 new homes (net gain of 101 homes) based on this ratio. As such, the loss of the existing 13 homes would be acceptable in principle given the uplift and net gain of 101 homes.”

On this basis, it is evident that councils across London are adopting the approach set out in the London Plan and accepting that PSBA is contributor towards housing supply.

3. Unite note that since this decision, the ratio at which PBSA counts towards housing supply has now changed given the December 2024 updates to the Housing Delivery Test measurement rule book. The rule book states the current ratio is 2.4. As a result of this update, PBSA now makes an even greater contribution to housing supply. For example, using the previous 2.5:1 ratio, a scheme of 300 beds would have made a contribution equivalent of 120 residential units. Now using the 2.4:1 ratio, the same scheme would make a contribution equivalent to 125 residential units.
4. Camden have themselves acknowledged at the draft supporting text paragraph 2.278 that *‘the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market’*.
5. This is further supported by a series of appeal decisions where Inspectors have granted consent for student developments where issues have been raised by the local planning authority (LPA) in terms of a perceived conflict with the development plan due to the view that the site should deliver conventional housing. These include:
 - 315-349 Mill Road, Cambridge (APP/Q0505/W/15/3035861);
 - Land at Fish Strand Hill, Falmouth, Cornwall (APP/D0840/W/17/3177902); and
 - Land at Ocean Bowl, Falmouth, Cornwall (APP/D0840/W/17/3182360).
6. It is an accepted principle that the fewer PBSA bedspaces that are available, the greater the number of students occupying HMO accommodation, the more demand for HMOs increases and the quicker the HMO market expands. The provision of additional PBSA bedspaces will therefore reduce this demand and the rate at which housing stock is converted to HMOs. This is recognised in the NPPG, which states that *“Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock”* (Paragraph: 004 Reference ID: 67-004-20190722 Revision date: 22/07/2019).
7. Also on the basis that PBSA contributes towards housing supply, with regards to Part B.2, , providing that the Site is in a well-connected and well-served area, any sites allocated for self-



contained residential development should also be allocated for PBSA. As such PBSA developments on residential site allocations should be supported not prevented.

8. Paragraphs 61-63 of the National Planning Policy Framework (NPPF) state that in order to support the Government's objective to significantly boost the supply of homes it is important that a sufficient amount and variety of land can come forward and that the needs of groups with specific housing requirements (including students) are addressed. NPPF paragraph 125c gives "*substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused*". Paragraph 125d goes on to "*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs*". As such, a positive approach should be taken to site allocations for housing and the inclusions of PBSA within these allocations, highlighting the importance of addressing the housing requirements of specific groups.

Recommendation: Part B.1 and B.2 should be removed in their entirety.

Part B.3 – Applying HMO Standards to PBSA

The text requires that PBSA schemes comply with the relevant standards for houses in multiple occupation (HMOs) and relevant residential design standards. Unite raise strong objection to this approach for the following reasons:

1. HMO and PBSA developments differ significantly. PBSA developments by their very nature provide an alternative form of residential occupation with an emphasis on shared facilities. They can allow for higher residential densities and thus a more substantial contribution to housing supply. HMOs standards are designed to accommodate a broad spectrum of tenants – including families, professionals, and other groups sharing a residence. Applying HMO regulations to PBSA fails to take into account the unique needs and lifestyle of student tenants, such as communal study areas and social spaces designed to foster academic and personal development. In this sense, HMO standards typically focus on general living conditions, safety, and amenities, without considering the specific educational aspect of tenants. PBSA schemes are not just places of residence but also environments that aim to support students academically.
2. Separate established guidance is in place at the regional level in respect of the approach to PBSA and it is argued that there is no policy justification to deviate from this guidance at the Camden local level. It is well-established that non-self contained dwellings such as PBSA and purpose-built shared living should not be subject to minimum space requirements.
3. Unite continue to support the approach taken by the current London Plan and PBSA LPG to not provide any example layouts, standards or similar given that PBSA designs evolve over time in

response to market trends and are also linked to operator branding and innovation. Future policy should continue to recognise that PBSA is of a transitional nature and thus living standards can remain acceptable without standards being applied.

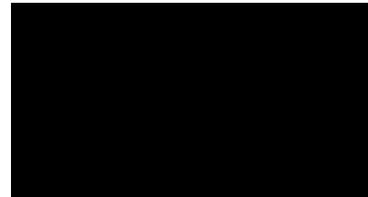
Recommendation: The policy should be amended to remove any mention of HMO standards and relevant residential design standards and instead clearly state that PBSA schemes should adhere to the established guidance already in place at the regional level in respect of the approach to PBSA.

Part B.12 and Policy H4 Part D – On-site Affordable Housing Contribution

Policy H9 Part B.12 states that whilst the PBSA proposals should provide affordable student accommodation, an alternative option is to provide an appropriate contribution to affordable housing in accordance with Policy H4, particularly Part D, whereby providing self-contained affordable housing are strongly encouraged.

Whilst Unite strongly support the removal of the requirement for on site contributions towards conventional affordable housing from the draft document, Unite continues to object to this point for the following reasons:

1. The alternative option for conventional affordable housing contribution will significantly hamper the viability and deliverability of student schemes and Unite recommend that instead it should **solely** follow the affordable contribution requirements outlined in the London Plan. Part 10 of Policy H16 of the London Plan states that *“developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses”*. Thus, 35% should be sought in the first instance, increasing only to 50% in the aforementioned circumstances.
2. It is essential to consider the implications of imposing this alternative contribution, especially when this has not been tested or assessed as detailed above. Applying affordable housing contributions to PBSA in the same manner as conventional residential uses is likely to cause viability challenges, failing to account the fundamental differences in these between these development types. For example, there are numerous additional costs associated with PBSA development that largely do not affect conventional residential dwellings, including the employment of staff to enforce Management Plans. Moreover, PBSA schemes are already subject to numerous other planning obligations and contributions which can affect viability, including Open space Contributions and Flood Risk contributions. At present, there is insufficient evidence to suggest that these further contributions have been taken into account when considering how the conventional affordable housing contribution will affect the development viability of PBSA.
3. Ultimately, an increase in costs associated with the development of PBSA in the city is likely to



have the following negative implications:

- PBSA providers will look to other cities and boroughs where the cost to develop PBSA is far lower;
- Regardless, fewer student schemes in Camden will be viable and thus fewer bedspaces will be delivered;
- Thus, the provision of PBSA bedspaces will fail to meet the current and increasing demand within the city leading to an increase in HMO's;
- The increase in demand for PBSA will lead to higher rental levels for those bedspaces that are deliverable, leading to a shortage in affordable student accommodation;
- Schemes that remain deliverable are likely to need to sacrifice communal amenity space or open space in favour of achieving a higher number of bedspaces; and
- Viability issues associated with off-site affordable housing provision may lead to a reduction in the level of other contributions, such as open space.

A constraint on the delivery of student housing is equally , by extension, a constraint on the delivery of housing as a whole. A continued undersupply of student accommodation will only place additional pressure on family housing as students will continue to be forced to occupy conventional dwellings.

4. Under current London Plan Policy H15, in order to be considered as PBSA, schemes must be subject to a nominations agreement which must include all the affordable student accommodation. Due to the viability implications of the increased costs involved with PBSA detailed above, if there were an option to provide affordable conventional housing instead, developers may choose to sacrifice the provision of affordable PBSA units and in turn a nominations agreement covering these units. This would therefore fail to comply with current policy, reduce affordable student accommodation provision and reduce the number of units universities secure through nominations agreements.
5. Indeed, there is an emerging trend where affordable student accommodation is being sacrificed in favour of conventional affordable housing requirements, as seen in the London Borough of Southwark. Local Plan policy P5 provides a route towards achieving 100% direct-let PBSA development where conventional affordable housing is provided as a first priority. Whilst the policy does also seek affordable student accommodation at reduced levels in comparison to London Plan policy H15 and does provide an avenue for the delivery of bedrooms without conventional affordable housing where 100% rooms are subject to nominations agreement, this is treated as less important than the provision of conventional affordable housing. Indeed, this position is made clear within the committee report for LPA ref. 22/AP/1068 located at 5-9 Rockingham Street and 2-4 Tiverton Street, London, SE1 6PF where the following is stated:



“Turning firstly to the matter of the London Plan’s specific requirement for student housing proposals to deliver affordable rooms, while this is noted, the Council’s priority is for conventional affordable housing due to the pressing need in the borough. Officers consider that although there would be some benefit to providing affordable student housing, this would be significantly outweighed by the benefits arising from general needs affordable housing delivery. Therefore, the latter should be prioritised.

[...]

Including affordable student housing within the development would adversely affect the overall viability, and therefore the level of contribution the development could make to general needs affordable housing.”

6. Unite note that similar concepts are emerging in other London Boroughs, including draft policy HF6 of the Tower Hamlets New Local Plan consultation, which concluded recently on 28th October 2024. Draft policy HF6 states:

“Development proposals for PBSA are required to:

- a. deliver a minimum of 50% affordable C3 homes on-site, or*
- b. where the location is not suitable for C3 affordable housing, deliver a minimum of 50% of units as affordable student accommodation on-site calculated by habitable room.”*

Evidently, there is seemingly an emerging trend across London which prioritises the delivery of conventional affordable housing over affordable student accommodation. As such, this trend does not match up with the aims of London Plan policy H15. However, Unite consider that draft Policy H9 is likely to reinforce this trend, resulting in a serious lack of affordable student accommodation being delivered.

7. Moreover, the requirement for conventional affordable housing from PBSA is ultimately in direct conflict with national policy. There is no national planning policy basis for the provision of affordable housing arising from PBSA developments, and the requirement for affordable housing contributions arising from student developments is therefore entirely local in planning policy terms..

Recommendation: Policy H9 Part B.12 and Policy H4 Part D should both be amended to remove the option of on-site affordable housing contribution for PBSA development.

Part C.4 – Loss of Student Housing



Part C.4 requires that PBSA should only be redeveloped as housing. Unite comment on this section as follows:

1. One of the primary concerns with the overly restrictive nature of Part C.4 is the potential limitation on Camden's adaptability to changing economic trends. A mandatory requirement for the development of other permanent housing uses in place of PBSA will inevitably overlook the benefits of a diverse and dynamic economic landscape. Restricting the use of former student housing sites to residential purposes may limit the variety of services and amenities available in a specific area. Allowing for mixed-use developments, including retail and employment spaces, can contribute to a more vibrant and dynamic community.
2. The demand for student housing may fluctuate over time due to changes in enrolment patterns, demographics, or the establishment of new educational institutions. Requiring the replacement of student housing with other residential units may not align with market demands, and flexibility in land use can better accommodate changing needs. A more balanced approach that considers the coexistence of different land uses can lead to more sustainable and inclusive urban planning. Adopting a one-size-fits-all approach to land use may not be conducive to effective urban planning and allowing developers flexibility in repurposing sites based on local needs and market demands enables better adaptation to changing circumstances and facilitates a more responsive and resilient planning strategy.

Recommendation: Part C.4 should be removed altogether.

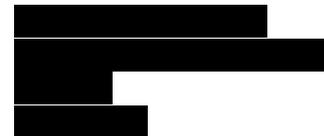
Additional comment on PBSA occupation

Additionally, Unite argue that the definition of the occupier of PBSA should be revisited and widened as part of future policy. PBSA developments could be occupied by additional population groups including those attending college, those on apprenticeships and those who have graduated within in the last 2-3 years. By widening the group of people to which PBSA can cater to, the housing typology can benefit a greater proportion of the population and make an even greater contribution towards housing delivery. Through providing accommodation for recent graduates, PBSA will also help to increase retention of students in the area.

POLICY D2 (TALL BUILDINGS)

Draft Policy D2 states:

- A. *The Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift*



overruns), as shown on Figure 22.

- B. Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12. Guidance on building heights for specific sites is set out in relevant site allocation policies.*

Unite generally supports Policy D2 which considers areas suitable for tall buildings. Tall buildings allow for vertical development and thus optimizing land use which is essential for the growing student population across London. This is especially beneficial in densely student populated areas where available land is scarce. Tall buildings allow for efficient land use, accommodating a larger number of students in a relatively small area. This promotes higher population density, creating a dynamic and vibrant student community. Well-designed student accommodation buildings can contribute to the aesthetic appeal of the cityscape, creating a distinctive skyline.

However, Unite recommend that a number of the locations where tall buildings may be an appropriate form of development (highlighted blue on Figure 22) are expanded to encompass Unite's existing student accommodation sites. A number of existing Unite PSBA sites are located immediately outside the boundaries of the following tall building locations. The map reference locations and associated policy numbers / site allocation references of interest are:

- Map reference C / Policy S6 - Parcellforce and ATS Tyre Site
- Map reference D / Policy S7 – St Pancras Hospital
- Map reference F / Policy C2 - Regis Road and Holmes Road Depot

The Unite sites located immediately outside the boundaries of these areas are as follows:

- Beaumont Court, College Grove NW, London NW1 0RW (located adjacent to Map area C)
- St Pancras Way, 11 St Pancras Way, London NW1 0PT (located adjacent to Map area D)
- Mary Brancker House, 54-74 Holmes Rd, London NW5 3AQ (located adjacent to Map area F)

Unite recommend that the boundaries of the aforementioned tall building locations are expanded to encompass

Beaumont Court, St Pancras Way and Mary Brancker House, for the following reasons:

1. It is both in the client's interest and the borough's interest to intensify existing PBSA sites and that these buildings are provided the opportunity to expand vertically alongside other sites in the immediate vicinity. The inclusion of Unite's existing Camden properties within the tall buildings boundaries promotes efficient land use as utilising already developed areas for vertical expansion minimizes the need for additional land acquisition and ensures optimal utilisation of existing infrastructure, thereby promoting sustainability and responsible urban planning. Expanding the boundaries would allow for vertical development without necessitating significant infrastructure



upgrades, promoting a more cost-effective and sustainable approach to growth. This will also encourage higher density development which can in turn make greater contributions towards housing delivery targets.

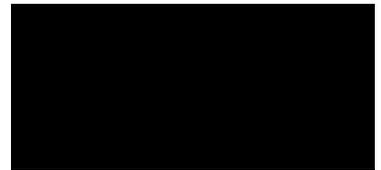
2. Without the expansion of these boundaries to include Unite's Camden properties, there is a considerable risk of overshadowing and marginalisation. New tall buildings within the designated zones could generate negative daylight, sunlight and amenity impacts, casting shadows over existing PBSA developments and potentially compromising their viability and attractiveness to existing and prospective students. This could lead to a scenario where the existing PBSA sites are left in the shadow of newer, taller structures, impacting their desirability and economic sustainability. Thus, it is essential that these properties are provided the opportunity to expand vertically if necessary.

Recommendation: The boundaries of map references C, D and F are expanded to encompass Beaumont Court, St Pancras Way and Mary Brancker House respectively.

POLICY IE4 (AFFORDABLE WORKSPACE)

The draft policy states:

- A. *The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:*
 1. *require all major schemes providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the delivery of affordable workspace;*
 2. *seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years; and*
 3. *apply the following hierarchy when securing affordable workspace:*
 - a. *on-site provision of affordable workspace that meets locally identified requirements in terms of type and specification (configuration, fit out, etc.) and addresses the demands of priority sectors and small and medium enterprises;*
 - b. *off-site provision of affordable workspace on another site in the borough that meets the requirements in A.3.a above. There should be a clear link between the off-site location and priorities for affordable workspace provision identified in the Council's Affordable Workspace Strategy;*
 - c. *a payment in lieu of provision that can be invested by the Council, which is equivalent to the cost of on-site delivery, in line with the payment in lieu calculator*



below. This will be used by the Council to fund affordable workspace elsewhere in the borough.

- B. The Council recognises that different types of affordable workspace are needed depending on location and that the costs of delivery will vary. To ensure the opportunities arising from affordable workspace are optimised, the Council will support a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. Any provision must be consistent with the definition of affordable workspace set out in the London Plan.*
- C. Where affordable workspace is provided, the Council will expect the applicant to submit an operating plan, setting out what model of affordable workspace is to be provided, sectors/occupiers to be targeted and details of how the space will be managed.*
- D. The Council will expect the affordable workspace element of a mixed-use scheme to be made available for occupation at the same time as any employment floorspace at market rents.*

The policy seeks to introduce a 20% requirement of affordable workspace. Whilst Unite are generally supportive of 10% proposed gross new employment floorspace as affordable workspace on site at discount market rents, 20% is objected to for the following reasons:

1. In combination with other affordable contribution requirements, such conventional affordable housing contribution outlined in Policy H9, implementing an affordable workspace requirement of 20% will affect the economic viability of development projects. The higher percentage could in some instances make certain projects financially unfeasible, discouraging investment and potentially stalling economic growth in the area.
2. It is important to consider the implications of enforcing such a contribution at the level currently proposed, especially when this has not been tested or assessed. As listed above in the rebuttal for Part B.12 of Policy H9, the increased costs associated with the development of PBSA in the city is likely to have a number of negative implications such as higher rental levels, unviability, fewer affordable bedspaces and the sacrificing of amenity / open space.

Recommendation: The affordable workspace contribution should be applied at 10%.

POLICY T2 (PRIORITISING, WALKING, WHEELING AND CYCLING)

Part 2 of Draft Policy T2 states:

Require development to provide for high quality, accessible, inclusive, convenient, and safe cycle

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parking facilities, exceeding the minimum standards outlined in the London Plan, and design requirements outlined within Camden Planning Guidance on Transport. Higher levels of provision will be expected in areas well served by cycle route infrastructure, taking into account the size and location of the development;

The Camden Planning Guidance on Transport requires that PBSA schemes provide cycle parking in accordance with the London Plan. Our client objects to this point for the following reasons:

1. The proposed minimum cycle parking requirement for student accommodation is provided within Table 10.2 (Minimum Cycle Parking Standards) of London Plan Policy T5 (Cycling), which sets the standard at 0.75 cycle spaces per bedroom unit for student accommodation and 1 cycle space per bedroom unit for co-living accommodation. Although Unite Students are supportive of the provision of cycle spaces to encourage sustainable travel, the proposed rates for 1 space and 0.75 spaces per bedroom unit are still considered to be unnecessary and unsound for several reasons set out in the following paragraphs.
2. Student housing is developed at higher densities than conventional housing and as a consequence and in order to provide these levels of cycle parking, large areas of floorspace typically at ground floor level, are required which could otherwise be used more efficiently and effectively for living or town centre uses thus reducing the viability of the scheme.
3. The uptake of cycling parking in general is low across Unite's schemes in London. A survey was recently undertaken in June 2025 and demonstrates that overall across London there is a 1.82% take up equating to 1 space per 55 students. At the property that showed the highest levels of take up, this was just under an 8% uptake of existing cycle parking spaces, equating to a maximum demand of one cycle space per approximately 13 students. The results are summarised in the table below:

Property name	Borough	Number of student bed spaces	Average number of bikes in the bike store as of June 2025	% take up
East Central House	Islington	246	4	1.63%
Sherren House	Tower Hamlets	255	13	5.10%
Station Court	Haringey	227	13	5.73%
Mary Brancker House	Camden	182	11	6.04%
Piccadilly Court	Islington	209	9	4.31%
Beaumont Court	Camden	232	2	0.86%
Rahere Court	Tower Hamlets	186	9	4.84%



Emily Bowes Court	Haringey	694	6	0.86%
Elizabeth Croll House	Islington	102	1	0.98%
Blithehale Court	Tower Hamlets	307	11	3.58%
North Lodge	Haringey	528	12	2.27%
St Pancras Way	Camden	571	17	2.98%
Stratford One	LLDC	1001	14	1.40%
Angel Lane	LLDC	759	20	2.64%
Student Living Heights	Islington	136	2	1.47%
Olympic Way	Brent	699	2	0.29%
Stapleton House	Islington	862	6	0.70%
Arch View House	Brent	678	0	0.00%
Arbour House (Sebastian St)	Islington	188	14	7.45%
Cross Court House	Islington	240	2	0.83%
Romano Court	Islington	295	0	0.00%
Walmsley Studios (St John St)	Islington	166	4	2.41%
Drapery Place	Tower Hamlets	677	0	0.00%
Totals:		9440	172	1.82%

4. The overprovision of cycle parking spaces is therefore an issue in PBSA developments. PBSA is developed at higher densities than conventional housing and as a consequence and in order to provide these levels of cycle parking, large areas of floorspace typically at ground floor level, are required. Large cycle parking stores take up unnecessary space which could have instead provided additional PBSA bedrooms and/or amenity space.
5. By way of an example, Unite were required to provide a minimum of 423 cycle spaces for a student scheme in the London Borough of Islington under current policy standards. This translates to a floor area of approximately 465 sqm or 385 sqm based on the typical requirements of 1.1sq.m for a Sheffield stand, or 0.91sq.m for a dual-stacking system respectively. Based on an average student cluster bedroom size of approximately 11sq.m, this would result in the unnecessary loss of approximately 35-42 student bedroom units.
6. Any increase or requirement to exceed these standards or the addition of standards for larger cycle spaces e.g. for e-bikes will only exacerbate the space lost to cycle parking. This space could otherwise be used more efficiently and effectively to cater for growing demand for student bedspaces and greater amenity space for occupiers.
7. Such high levels of cycle parking has meant that there has needed to be a reliance on greater proportions of high-density cycle parking i.e. two-tiered spaces.

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8. Whilst Unite recognises that high quality cycle parking for their student occupiers is fundamental for facilitating cycle ownership and use, increases in cycle parking provision associated with the current and previous iteration of the London Plan, has simply led to a greater amounts of under-utilised cycle parking.
9. An increase in the provision of cycle parking for PBSA has not resulted in an increase in cycle ownership for students.
10. There are a number of reasons as to why cycle use amongst students remains low, despite significant amounts of quality cycle parking within their place of resident.
11. Firstly, for student occupiers, particularly over-seas students, it is simply impractical to bring their bicycle to their place of study. Students, being brought to their place of study by parents are unlikely to have any remaining space within their cars to transfer bicycles as well; with this being further complicated for overseas students travelling by air. This leads to a low number of students using bicycles for their daily travel needs. There are also alternative cycle hire options, offering a more practical solution for cycle access.
12. Secondly, PBSA schemes are generally within walking distances of places of study with students tending to locate adjacent to their place of study for convenience. Alternatively, the PBSA is located within areas of high public transport accessibility, allowing the majority of journeys to be undertaken on foot or via public transport.
13. There are also other contributing factors that may discourage some students from cycle ownership and use, related to a perception around cycle safety in London and poor cycle parking facilities at Universities.
14. Finally, the influence and take up of cycle hire schemes, such as lime bikes which have immensely grown in popularity since the publication of the current London Plan, provide an affordable alternative to private cycle use. They preclude the need for private cycle ownership and storage, eliminating the need for students to bring bicycle to their accommodation, invest in the safety, security and maintenance associated with private ownership of both standard and larger bikes.
15. Greater flexibility should be afforded to PBSA developments and these should not encourage provision which significantly overprovides in comparison with recorded uptake. This should be especially relevant where it can be demonstrated that a scheme lies in a highly accessible location, or where cycle hire schemes or pool bikes are being provided in proximity of the site.



16. Noting the potential additional bedspace delivery as a result of the removal of unnecessary cycle parking, Unite respectfully request that the evidence provided is given due consideration. Unite would welcome further discussion on this issue, including the potential to replace conventional cycle parking provision with considerations of pool bikes and other means of encouraging sustainable means of transport.

17. We suggest a level of cycle parking equivalent to 10% of the total number of bedspaces which is a level of provision still significantly above the current take up, allowing for future growth. This would also allow for a focus on a greater amount of single rather than two tier cycling racks such that the cycle provision is as accessible and user friendly as possible.

Recommendation: It is considered that the proposed levels of cycle parking for student housing should be considered on a case-by-case basis as supported by the evidence referred to above. At most, Camden should require a 10% provision of cycle parking spaces.

POLICY CC2 (PRIORITISING THE RETENTION OF EXISTING BUILDINGS)

The draft policy states:

- A. *The Council will expect developers to prioritise the retention and improvement of existing buildings over demolition.*
- B. *Developers considering the substantial demolition of existing buildings will be expected to undertake the following assessments, before progressing detailed proposals for submission:*
 - 1. *a condition and feasibility assessment, which should be undertaken at the earliest opportunity; and*
 - 2. *development options appraisal, which should use the findings of the condition and feasibility assessment to explore feasible development options for the site. The options appraisal should provide justification as to why the preferred option has been selected and why other options that could retain more of the existing building/s have been discounted.*
- C. *The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council's satisfaction that:*
 - 1. *there are significant structural issues with the existing building that would prevent it from being retained and improved;*
 - 2. *the developer has comprehensively explored a range of feasible alternative development options, informed by the condition and feasibility assessment, prior to considering substantial demolition, and it has been demonstrated to the Council's satisfaction that the existing building cannot be retained or improved;*



3. the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and optimises site capacity.

D. Where less than substantial demolition is proposed, developers will be expected to demonstrate to the Council's satisfaction that the proportion of the building being demolished has been reduced as far as possible, in accordance with the waste hierarchy and circular economy principles set out in Policy CC3 (Circular Economy and Reduction of Waste).

E. Where it is demonstrated to the Council's satisfaction that the demolition of all or part of an existing building is justified, the developer will be required to submit a pre-demolition audit and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).

Whilst Unite agree with the policy in principle, the refurbishment for refurbishment's sake should be avoided. Unite suggest that the most sustainable solution for refurbishment, would be an efficiently utilised building, constructed with low embodied carbon (either new build or refurbishment), and operated in-line with Net Zero Carbon principles.

Recommendation: It is considered that refurbishment should only be supported where it achieves low embodied carbon, efficient use, and Net Zero Carbon principles – avoiding refurbishment for its own sake.

POLICY CC3 (CIRCULAR ECONOMY AND REDUCTION OF WASTE)

The draft policy states:

A. The Council will seek to ensure that developments minimise waste, use resources efficiently, and are designed to facilitate easy maintenance, adaptability of use and deconstruction for future re-use.

B. Development will be expected to:

1. reduce waste through the application of the waste hierarchy (Prevention, Prepare for reuse, Recycling, Other recovery, Disposal);
2. minimise the amount of materials used;
3. use materials with a low embodied carbon content;
4. ensure any dismantled materials are sorted and utilised on-site wherever practicable; and
5. reduce water use during demolition and construction, whilst effectively mitigating air quality impacts.

C. The Council will require applications for new build major development and major development



which involves substantial demolition and rebuild to submit a Circular Economy Statement.

- D. Where a Circular Economy Statement is required (as set out in (C) above), developers will be encouraged to explore opportunities to use the site, or other local sites, for the temporary storage of reusable materials, during the construction phase to enable other developments in the locality to use those materials.*
- E. The Council will continue to safeguard Camden's existing waste site at Regis Road in accordance with the North London Waste Plan.*

Unite generally support the policy in principle, however development proposals should avoid having to be driven down over engineering for flexible design. PBSA schemes will often be designed most effectively and efficiently from a sustainable and commercial perspective, in a way that might be deemed to lack future adaptability.

The Circular Economy requirements should take into consideration the level of detail required at a planning stage. Unite often find that there is excessive emphasis on providing information that is unavailable at the concept design stage. The policy should be implemented in such a way that it acts as a framework for encouraging positive decision making as schemes enter technical design and construction phases.

Recommendation: Circular Economy requirements should be proportionate to the planning stage and do not compromise sustainable, efficient PBSA design by over prioritising flexibility or detail at an early stage.

POLICY CC4 (MINIMISING CARBON EMISSIONS)

The draft policy states:

- A. The Council will seek to ensure that development proposals minimise carbon emissions over the lifespan of buildings and actively reduce embodied carbon.*
- B. The Council will require developers for all new build major development and all development proposing substantial demolition to submit a Whole Life Cycle Carbon (WLC) emissions assessment. This should be submitted as part of the planning application and demonstrate:*
 - 1. that carbon emissions over the lifespan of the building meet the GLA's aspirational WLC benchmarks. Where a developer can demonstrate to the Council's satisfaction that this is not feasible, the Council will expect the development to meet GLA WLC standard benchmarks as a minimum; and*
 - 2. what action has been taken to reduce upfront embodied carbon in the development.*



Unite would suggest that the policy would benefit from being more aspirational, e.g. including a requirement to align with the UK Net Zero Carbon Building Standard (NZCBS) or drive Whole Life Carbon performance/ disclosures beyond where the GLA currently requires.

Current WLCA benchmarks are largely generalised, and often skewed toward commercial or open-plan residential typologies. In PBSA, emissions are typically front-loaded through highly serviced, compact fit-outs and mechanical systems. The embodied carbon of MEP and interiors and their shorter renewal cycles disproportionately impacts lifecycle emissions.

As such, Unite recommend developing typology-adjusted WLCA benchmarks, with reference to NZCBS and RICS guidance, to reflect the specific material, system intensities and service profiles of PBSA.

Recommendation: The policy could be amended to establish more ambitious targets.

POLICY CC6 (ENERGY USE AND THE GENERATION OF RENEWABLE ENERGY)

Part A.3 of the draft policy states:

3. minimise total energy use. For each of the building types set out below (or the nearest equivalent), the Council will expect development to meet the Energy Use Intensity targets set out below, unless it is demonstrated to the Council's satisfaction that it is not feasible:

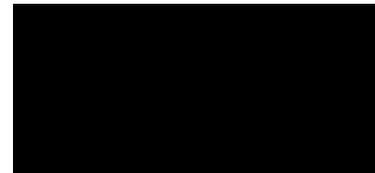
- a. residential buildings - 35 kWh/m²GIA/yr;*
- b. offices, Retail, Higher Education Teaching facilities, GP surgeries - 70 kWh/m² GIA/year;*
- c. student accommodation, care homes, extra care homes - 35 kWh/m² GIA/year;*
- d. hotels - 160 kWh/m² GIA/year;*
- e. light industrial units - 35 kWh/m² GIA/year; and*
- f. schools - 65 kWh/m² GIA/year.*

Unite welcome operational Energy Use Intensity (EUIs) targets as they:

- Provides a clear, measurable target for operational performance one that can be verified post-occupancy.
- Reflects the true nature of energy demand, where conventional compliance models fail.
- Encourages better design choices around passive strategies, load reduction, and MEP efficiency from the outset.

However, the targets proposed are considered unachievable and utilise out of date kWh/m² for Student Accommodation. Unite suggest that these are instead grounded in TM54 analysis and aligned with the NZCBS

rather than the LETI guidance. The residential number outlined (35 kWhm/m²) is unachievable and



outperforms even the best PH PBSA schemes.

It is also suggested that EUI should be reported against per bed in addition to floor area, to avoid penalising highly efficient schemes as bedrooms/kitchen areas will consume more than amenity and communal areas.

Furthermore, Unite disagree with the energy offset price of £1.32/kWh/year, stated in supporting paragraph 8.87. This figure is dramatically excessive and would prohibit any residential schemes particularly where the building footprint is tight. Such a requirement may lead to inefficient building layouts in order to comply. The renewable energy targets from the UK Net Zero Carbon Building Standard, or an appropriate kWh/m² building footprint target should be considered in lieu of the current balanced target.

Recommendation: The EUI targets should be revised and energy offset pricing to reflect realistic, evidence-based benchmarks, aligned with the UK Net Zero Carbon Building Standard.

POLICY CC7 (HEAT NETWORKS)

The draft policy states:

- A. *Major developments will be expected to utilise energy from heat networks, or be designed and constructed to be able to connect to a heat network, where feasible.*

The Council will:

- 1. expect major development to comply with the London Plan policy on Energy infrastructure and refer to the related GLA Energy Assessment guidance for heat networks and utilising secondary heat sources; and*
- 2. expect major development to prioritise connection to a low carbon heat network.*

Unite recommend that developments should be permitted to provide a Whole Life Carbon assessment of connecting to a district heat network, comparing against a building level solution, with the flexibility to opt for the lowest carbon approach. Actual DHN emissions factors should be utilised rather than fabricated factors based on potential decarbonisation.

Furthermore, a development shouldn't be required to make a Section 106 offset payment if it is forced to utilise a DHN, particularly if they can provide a lower carbon solution. The offset payment should be aligned with decarbonisation of DHN with the option to defer the s106 payment to align with actual in-use carbon emissions.

Unite also suggest that the potential overheating impacts associated with DHNs should also be taken

ROK PLANNING

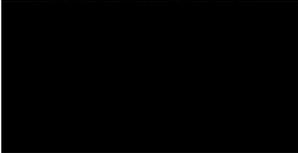


into account.

Recommendation: The policy should be amended to allow for flexibility for major developments to pursue the lowest Whole Life Carbon option.

I trust the above representations are in order and we look forward to confirmation of their safe receipt. If you require further clarification or wish to discuss this further, please do not hesitate to contact either [REDACTED] or myself at this office.

Yours Sincerely,



Matthew Roe



Responder 619

Date: Fri, 27 Jun 2025 15:37:15 +0000

From: Natalie Render

To: PlanningPolicy

Subject: Representations to the Camden Local Plan Review - Euston Masterplan

CDT/NR/DP5449

27th June 2025

Planning Policy
Camden Town Hall
Judd Street
London
WC1H 8EQ

By email to planningpolicy@camden.gov.uk

Dear Planning Policy Team,

CAMDEN LOCAL PLAN REVIEW: REG. 19 CONSULTATION

Introduction

Thank you for the opportunity to respond to the Reg. 19 consultation on the review of the Camden Local Plan. These representations are being submitted on behalf of our client, Lendlease (the Master Development Partner for Euston), and the Euston Landowners (the Department for Transport, High Speed 2 Ltd and Network Rail Infrastructure Limited ('Network Rail')).

Euston offers one of the most significant development opportunities in central London to create a major new piece of city, with high quality buildings and public realm, containing new commercial uses, new homes, and a new national transport interchange (and as such is recognised as an Opportunity Area in the London Plan). This opportunity can only be realised with flexible and pragmatic planning policies in place within the Camden Local Plan to recognise the unique characteristics of a nationally significant project with a substantial infrastructure requirement, such as Euston.

Significant work, led by The Euston Partnership, has been undertaken over the last 12 months to find a cross-campus solution, supported by all the Project Partners, including the London Borough of Camden, that could provide a basis for continued progression of this opportunity through to detailed design and a planning application submission for the over and adjacent station development masterplan.

If Euston is to harness a once in a lifetime opportunity to drive growth at a local, regional and national level and to maximise the wider benefits to local and London community, this will require maximised commercial development and a balanced approach taken to the preparation and application of planning policy. This is especially the case in the context that the development plots within the masterplan are required to partly fund the HS2 station.



The Euston masterplan faces unique challenges associated with the delivery of HS2 alongside redeveloping the existing station, as well as many challenges that are common to other major brownfield developments. This includes significant viability challenges because of reduced building efficiencies following regulatory changes, increased build costs, increasing developer contributions, falling capital values in real terms, and significant infrastructure requirements to transform this large-scale brownfield site.

Overall, the economics of Euston are challenging, requiring large risk exposure. It is crucial that this economic reality is understood and reflected within the review of the Local Plan given that Euston is a strategically important site for the London Borough of Camden that plays a key role achieving the Local Plan targets.

Although the Euston Area Plan is where most of the detailed policy regarding the Euston masterplan will be contained, it is equally essential that the strategic policies contained within the review of the Local Plan are appropriate and do not undermine the delivery of the Euston masterplan through an inflexible application of policies that do not recognise the characteristics of nationally significant projects with material infrastructure requirements, such as Euston.

Lendlease and the Euston Landowners have some major concerns about the Local Plan review, principally in relation to the policies that deal with the optimisation of Euston, tall buildings, flexibility and viability, and the significant cumulative impact of other policies within the Local Plan.

We ask that the London Borough of Camden also has regard to our previous representations dated January 2023 and March 2024 and the more detailed points raised which have not been fully addressed. These are appended.

1. Optimisation of the Euston Opportunity

The preface to **Policy S2** highlights the potential for intensification within the Euston Area. However, this sentiment should be a key part of the policy text to ensure that this is applied in decision-making about the Euston masterplan. We consider that **Policy S2** could contain a stronger reference to the opportunities afforded by the optimisation of Euston but the viability challenges of delivering the masterplan. We suggest that the underlined wording is introduced to Policy S2.

“To realise the vision and objectives set out in the Euston Area Plan, the Council will:

1. Support the optimisation of development at Euston, recognising that there are tangible viability challenges associated with the delivery of nationally significant transport infrastructure and associated development projects”.

Policy S2 sets out that development at Euston will deliver between 1,500 and 2,500 additional homes in total. Lendlease and the Euston Landowners have concerns with a fixed limits being included in the policy and believe that the capacity of the site should be tested through a planning application process with the London Borough of Camden. These perceived limits are also a concern as Lendlease and the Euston Landowners need to be certain that the pressure for housing does not compromise delivery of employment space within the masterplan given the Government’s stated growth aspirations.



We ask that the policy wording is amended as follows:

“2. expect the development at Euston to be optimised, with the capacity for housing tested through discussions with the Council during the planning application process and balanced with the delivery of employment floorspace; deliver between 1,500 and 2,500 additional homes in total, along with the provision of appropriate replacement homes;”

2. Tall Buildings

Policy D2 defines tall buildings across the Local Plan area, including the Euston Area. Tall buildings are defined as over 40 metres in height in the southern part of the Euston Area (contiguous with the Central Activities Zone) and as over 30 metres in height in the northern part of the Euston Area. This means that buildings proposed within the masterplan over these heights will be subject to assessment under London Plan Policy D9 (Part C) and Local Plan Policies D1 and D2 (Part C).

Lendlease and the Euston Landowners believe that building heights on key sites like Euston must reflect a scale that generates value.

Whilst it is recognised that Policy D9 of the London Plan indicates that tall buildings should be defined in Local Plans, we consider that any stated thresholds for tall buildings within **Policy D2** should be indicative.

Policy D2 should avoid prematurely constraining development, and we believe appropriate building heights will be arrived at through testing and analysis at planning application stage.

We also ask that the policy acknowledges that major station and public transport nodes, such as Euston, benefiting from nationally important transport infrastructure, are best placed to achieve the greatest height and density.

This is recognised in the London Plan Policy GG2 which explains that, to make the best use of land, those involved in planning and development must prioritise sites which are well connected by existing or planned public transport. Supporting text to London Plan Policy D9 also acknowledges that tall buildings can facilitate regeneration and make optimal use of the capacity of sites which are well-connected by public transport.

We request the following specific adjustments are made to the policy text:

“Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12. The exact appropriate building heights will be determined at planning application stage. Major station and public transport nodes are the locations best placed to achieve the greatest height and density. Guidance on building heights for specific sites is set out in relevant site allocation policies.”

In general, it would also seem appropriate that the assessment of tall buildings within the Euston Area principally takes place through the Euston Area Plan (which is currently subject to review) rather than through the Local Plan.



3. The Need for Flexibility

The supporting text to **Policy DM1** talks generally about how the individual policies in the Local Plan include an element of flexibility in relation to the consideration of the viability of development. However, we consider that this flexibility has not been expressed clearly enough in **Policy H4** regarding affordable housing, **Policy EI4** regarding affordable workspace, nor **Policy H2** regarding mixed uses.

Affordable Housing

Part B of **Policy H4** sets down the various ways that the contribution towards affordable housing will be negotiated for development proposals, and how, in the case of larger developments, the London Plan's strategic affordable housing target of 50% will apply but will be subject to the London Plan's viability threshold approach. We accept that the Local Plan must be in accordance with the London Plan, but we have made recommendations to the London Mayor through the 'Towards a New London Plan' consultation that there should be an easier and streamlined approach to achieve fast-track compliant proposals for sites like Euston.

We would like to see acknowledgment in **Policy H4** of the difficulties that can be experienced on public sector land, where there are often significant abnormal costs to unlock the development potential which heavily influence the viability of sites like Euston.

We also ask that **Policy H4** offers greater flexibility in terms of affordable products, which complement wider development objectives e.g. for Euston it will be important to allow affordable housing products to support the Knowledge Quarter.

We therefore suggest the following wording is introduced to **Policy H4**:

"B. We will expect a contribution to affordable housing from all major developments involving housing, and non-major developments that provide one or more additional homes and involve a total addition to housing floorspace of 100 sqm GIA or more. The Council will seek to negotiate the contribution to affordable housing on the following basis:

12. In the case of public sector land, consideration will be given to a range of affordable housing products, including those which are bespoke to the development that is proposed;

"E. In considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:

8. the economics and financial viability of development on public sector land where this involves extraordinary enabling costs;"

Affordable Workspace

Part A of **Policy IE4** requires major schemes providing at least 1,000sqm GIA of offices or R&D uses to deliver affordable workspace, with a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years. The policy details a



preference for on-site provision of affordable workspace but contains alternatives including off-site provision and payment in lieu, where this is equivalent to the cost of on-site delivery.

This requirement is very onerous in the context of the wider viability pressures at Euston, and as such, we request that Part A of **Policy IE4** is more explicitly clear that the ‘working benchmark’ is subject to viability.

Part B of **Policy IE4** does support a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers, but this could be improved to state that various different affordable workspace products might be appropriate in some circumstances.

The policy text should be re-worded as follows:

“The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:

2. seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years, subject to viability;

Mixed Uses

Policy H2 outlines that, where non-residential development is proposed in any part of the borough, the Council will support promote the inclusion of permanent self-contained homes as part of a mix of uses.

Though it is recognised that this policy exists in the current version of the Local Plan, it is less applicable to large-scale masterplans than individual sites. At Euston, it is important that Lendlease and the Euston Landowners can allocate zones of the site purely to commercial uses and retain the flexibility to ‘swing’ plots from residential to commercial uses without then triggering the need to include an element of housing in a dedicated commercial plot.

Large areas of the Euston masterplan have the potential to be wholly commercial floorspace and it is not necessarily appropriate for all plots to contain a mix of uses. For example, commercial plots can be located above and directly adjacent to station infrastructure, whereas this is not feasible for residential plots.

We ask that the London Borough of Camden amends the policy text to make it clear that this policy does not apply to individual development zones/ development plots within large-scale masterplans.

We ask that the policy wording is amended as follows:

“A. Where non-residential development is proposed in any part of the borough, on individual sites rather than within development zones/plots within a large-scale masterplan, the Council will support the aims of Policy H1 by promoting the inclusion of permanent self-contained homes as part of a mix of uses.”



4. Cumulative Impact of other policies in the Local Plan

When taken together with the issues set out for the strategic policies above, Lendlease and the Euston Landowners remain concerned that the cumulative impact of the proposed policy requirements is highly likely to undermine the ability to maximise land receipts and contribute toward funding the HS2 station at Euston.

Summary

In summary, unless a more pragmatic and flexible approach can be found to the expression of the policies within the Local Plan, then there is a risk that development potential and associated benefits at the Euston site will be restricted. The policies as drafted could genuinely deter the delivery of this strategic site, calling into question the soundness of the Local Plan.

We trust these representations can help the London Borough of Camden in the next stage of its work ahead of submitting the Local Plan for Examination in Public. Lendlease and the Euston Landowners remain committed to engaging proactively and constructively with the London Borough of Camden, seeking outcomes that will maximise Euston's potential at a local and national level.

Yours faithfully

DP9 Ltd.

DP9 Ltd.



Appendices

CDT/NR/DP5449

13th March 2024

**Planning Policy Team
London Borough of Camden
2nd Floor
5 Pancras Square
N1C 4AG**

Dear Planning Policy Team,

CAMDEN LOCAL PLAN REVIEW: REG. 18 CONSULTATION

Introduction

Thank you for the opportunity to respond to the Reg. 18 consultation on the review of the Camden Local Plan. These representations are being submitted on behalf of our client, Lendlease (the Master Development Partner for Euston), and the Euston Landowners (the Department for Transport, HS2 Ltd and Network Rail).

Lendlease and the Euston Landowners were previously engaged in detailed pre-application discussions with the Local Planning Authority ('LPA') and the Greater London Authority ('GLA') in relation to a masterplan that would facilitate the comprehensive redevelopment of Euston to create a world-class transport interchange with new homes, jobs, retail, leisure, and cultural facilities.

In March 2023, following an announcement by the Transport Secretary, the Department for Transport ('DfT') paused work on HS2 at Euston due to affordability challenges. This has prompted HS2 Ltd to reconsider the Euston station scope, redesign and reschedule the submission of the HS2 Schedule 17 ('S17') application. The Government's intention is now that the Euston HS2 scheme will be privately financed, and this represents a new context for the emerging Euston masterplan.

Subsequently, in October 2023, the Prime Minister announced the shifting of the HS2 project to a development-led model. The key change in this model is that private finance from the Euston masterplan will be directly used to fund the HS2 Euston terminus delivery. The masterplan application may therefore come ahead of the HS2 S17 application (and Network Rail's Redevelopment of Euston Conventional Station ('RECS') project).

In light of the HS2 pause, and the interrelationship between the HS2 station and the wider Euston masterplan, discussions on the masterplan have slowed down in the period since March 2023 but are expected to re-start with the LPA and GLA in the near future.



With the new development-led model, there is a need for the Euston masterplan to maximise land receipts in order to finance the HS2 station, and HS2's link to its Euston terminus from Old Oak Common. This will involve raising significant funds, which will have a fundamental impact on the development that comes forward on the Euston campus, and the public benefits that can be delivered outside of the significant transport improvements.

Network Rail separately has a business case for the RECS project which includes a budget to provide enabling works for development to come forward above and around the redeveloped concourse. Future phases of the Network Rail RECS project will be subject to separate business cases.

The vision for Euston remains as a significant new piece of city at the heart of London's Knowledge Quarter and for comprehensive redevelopment of the entire masterplan area, alongside HS2 and Network Rail's redeveloped transport infrastructure. The scale and complexity of the masterplan and its relationship with the transport infrastructure means that it will be phased and delivered over many years.

Lendlease and the Euston Landowners welcome the opportunity to be involved in the Local Plan preparation as a key stakeholder within the borough, especially given the importance of the Euston masterplan to meeting the objectives and policies in the Local Plan.

Lendlease and the Euston Landowners support the review of the Local Plan to ensure that development in the borough is governed by robust, effective and up-to-date policies that respond to changing circumstances and the borough's unique characteristics.

We would, however, like to make some comments as to how the Local Plan should adopt a more flexible approach with key policies to enable the delivery of large-scale mixed-use masterplans, such as the Euston masterplan, building on our previous representations from January 2023. The emerging Local Plan should reflect the viability challenges that are faced by the Euston masterplan.

Relationship with the Euston Area Plan

The LPA consulted on an update to the Euston Area Plan at the start of 2023 and intends to carry out a further consultation in the summer 2024. DP9 Ltd submitted representations to the Euston Area Plan update in February 2023 on behalf of Lendlease and the Euston Landowners and will continue to engage with the LPA on the Euston Area Plan update going forwards.

The review of the Local Plan has not considered potential development sites that sit within the Euston Area Plan boundary as these are being taken forward as part of the Euston Area Plan update.

Although the Euston Area Plan update is where the majority of detailed policy regarding Euston will be contained, it is still important that the strategic policies contained within the review of the Local Plan are carefully considered to ensure that there are no unintended consequences for delivery of the Euston masterplan.

The review of the Local Plan needs to involve careful consideration of the cumulative burden of policies, obligations and other requirements which will be applied to Euston. This is now even more important in the context of the development-led model for the masterplan project, which relies on private finance.



The Vision for Euston

The Local Plan review document currently says very little about the scale of the opportunity at Euston. It references that major development is planned at Euston that is likely to come forward towards the end of the Local Plan period. We consider that the scale of the opportunity at Euston should be more explicitly referenced in the review of the Local Plan, owing to the linkage between the Euston masterplan and the delivery of critical (national) infrastructure, and homes and jobs for the borough.

Policy S1 introduces the aspirations for the South Camden sub-area including the role of the Central Activities Zone ('CAZ') and Knowledge Quarter at King's Cross and Euston, but would benefit from a more direct reference to the Euston masterplan and the associated public benefits, including the regeneration of a brownfield site, economic growth and employment creation, and the delivery of housing and affordable housing.

The Need for Flexibility

We strongly support the sentiment in the supporting text to **Policy DM1** that the Local Plan needs to be flexible enough to respond to changing circumstances in meeting the borough's needs for homes, jobs, services and infrastructure. The supporting text to **Policy DM1** explains that individual policies in this Local Plan include an element of flexibility where appropriate, in particular in relation to the consideration of the viability of development schemes and site-specific issues. This openness to flexibility is welcome given the Euston masterplan is a long-term project that will be delivered over a prolonged time period, towards the end of the Local Plan period.

The emerging Local Plan needs to acknowledge recent case law around 'Hillside' and 'Dennis' to ensure large-scale multi-phase regeneration schemes are able to secure sufficient flexibility to respond to changes in commercial circumstances, macro-economic conditions and planning policy over time. The masterplan development at Euston will be phased with a potential early release of plots.

Further clarity is needed within **Policy DS1** to ensure long-term multi-phase schemes like Euston can come forward in a phased and 'severable' way without being constrained by the broader requirements of this policy.

Housing

Housing Supply

Policy H1 outlines how the Local Plan aims to deliver 11,550 additional homes (770 homes per year) in Camden over the period to 2041. In the supporting text to **Policy H1**, there is a section describing the intended flexible implementation of this policy, and that the LPA will be able to tailor its objectives to the particular circumstances of each proposal with a view to maximising delivery. The supporting text goes on to discuss possible measures to ensure flexibility, such as varying the proportion of market and affordable housing; varying the split between low-cost rented housing and intermediate affordable housing; varying the range of home sizes sought, particularly amongst market housing; and reviewing the range of Section 106 requirements sought, to maintain viability.



The supporting text goes on to say that, in negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the LPA will have regard to the characteristics and constraints of the site and the area, the financial viability of the development, and other Local Plan objectives.

Flexibility for the Euston masterplan in the way described in this policy is welcome in the context of the very long-term delivery timeframe of the project and in light of the fact that the project is now required to fund HS2 at Euston.

However, the policy essentially outlines the presumption that sites will be developed for housing unless it can be proven this is unviable. Retaining flexibility within large-scale brownfield regeneration projects needs to be recognised, particularly where a scheme may need to be a commercial-led mixed use development rather than a residential-led mixed-use development. Retaining flexibility on use mix is important to optimise development value to the Euston Landowners.

Mixed Uses

Policy H2 outlines that, where non-residential development is proposed in any part of the borough, the LPA will support the aims of **Policy H1** by promoting the inclusion of permanent self-contained homes as part of a mix of uses. The policy goes on to discuss how the LPA will negotiate the inclusion of self-contained housing.

It is recognised that this policy exists in the current version of the Local Plan; however, it is less applicable to a large-scale masterplans than individual sites. At Euston, it is important that Lendlease and the Euston Landowners have the ability to allocate zones of the site purely to commercial uses (and the ability to ‘swing’ plots from residential to commercial uses without then triggering the need to retain an element of housing in a dedicated commercial plot).

Large areas of the Euston masterplan have the potential to be wholly commercial floorspace and it is not necessarily appropriate for all plots to contain a mix of uses. For example, commercial plots can be located above and directly adjacent to station infrastructure, whereas this is not feasible for residential plots. These policies should not be strictly applied to Euston, and should be covered by the Euston Area Plan update in a more bespoke and flexible manner.

Affordable Housing

Policy H4 sets out that the LPA supports the London Plan’s strategic target for 50% of London’s new homes to be genuinely affordable. Part F of the policy explains that, having regard to the London Plan, where the development’s contribution to affordable housing falls significantly short of the LPA’s targets due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek early, mid-term and / or late stage viability reviews to determine the maximum contribution to affordable housing deliverable by the development. However, Policy H4 does not reference London Plan Policy H5 where the threshold approach to applications is set out, and explains how development proposals can be fast tracked if they meet certain affordable housing thresholds. This seems to be an obvious omission in terms of the viability picture within **Policy H4**.

Lendlease and the Euston Landowners support the LPA’s recognition that all aspects of financial viability must be considered in negotiating the provision of affordable housing, including the particular costs associated with the development. With Euston, the requirement to fund the HS2 station and



connecting tunnels will directly affect the level of affordable housing that can be provided, given the counter effect the delivery of affordable housing will have on the land receipts.

Employment

Meanwhile Uses

Lendlease and the Euston Landowners support the objectives of **Policy IE1** which is to secure a strong, diverse, sustainable, and inclusive economy in Camden. **Policy IE1** also outlines that the LPA will expect temporary uses (or ‘meanwhile uses’) within development in appropriate circumstances.

The incorporation of meanwhile uses is a key aspiration of the Euston masterplan. Given meanwhile uses have a role in bringing people and businesses together during long construction programmes, it would seem appropriate for the supporting text to the policy to acknowledge that meanwhile activation of sites would be considered a developer contribution to public benefits.

Affordable Workspace

Policy IE4 requires major schemes (including mixed-use developments) providing at least 1,000sqm GIA of offices, research and development uses, or light industry to contribute to the delivery of affordable workspace, where 20% of the gross floorspace is to be provided at 50% of the market rent for a minimum period of 15 years. The policy details a preference for on-site provision of affordable workspace but contains alternatives including off-site provision and payment in lieu, where this is equivalent to the cost of on-site delivery.

London Plan Policy E3 (Part C) sets out that boroughs should consider detailed affordable workspace policies in light of local evidence of need and viability. As currently drafted, we do not consider that **Policy IE4** or the supporting text is rooted in published evidence.

Lendlease and the Euston Landowners welcome the reference in the supporting text considering viability, however, the policy must be underpinned by published evidence to justify it. It must be made clear what the affordable workspace need is in the borough over the Local Plan period, what the deficit in space is, and more specifically what type of space is required and what the qualification criteria are.

There is a risk that without clear identification of local need, requirements for high proportions of affordable workspace with significant discounts could significantly impact segments of the B grade office market. For example, flexible office space operators which could take on B grade office buildings, vacant buildings or repurposed spaces may be forced out of the market. This would negatively impact reuse of vacant spaces, which would run counter to sustainability and re-use policies.

Late-stage viability reviews add complexity, uncertainty and challenge when considering a complex mixed use scheme, delivered over many years, with extreme up front infrastructure and enabling costs. Certainty is key to providing market confidence to enable development to come forward. Without certainty it’s likely return expectations may be adjusted to reflect a greater risk position.



We also draw attention to supporting text paragraph 6.3.2 of London Plan Policy E3 where affordable workspace is defined as workspace “that is provided at rents maintained below the market rate” but where no level of discount is specified. The 50% discount proposed within Policy IE4 therefore requires much more justification as to how this level of discount has been arrived at.

It is not clear in the policy or supporting text whether a lower percentage could be delivered onsite, with the payment in lieu making up the shortfall against the 20% target. In the interest of providing maximum flexibility to facilitate the Euston masterplan, we recommend that such a situation is allowed for within the policy. The affordable workspace policy should reflect London Plan policy, and the challenge of providing the suggested policy requirement in the context of development viability.

The policy wording and supporting text implies that the 20% affordable workspace requirement applies to the total amount of employment floorspace in the proposed scheme. In a case where commercial floorspace already exists on a development site, we assume that this would apply to the uplift in commercial floorspace, rather than the total amount proposed (this is relevant to the existing 1 Eversholt Street which will sit within a development plot). This should be clarified.

The supporting text discusses a potential requirement for fitted out space (rather than ‘shell and core’ space) and for the potential requirement for Cat A grade space. Taken together with the 20% quantum at 50% discount, this is a very high bar that will undoubtedly threaten the viability of many mixed-use schemes including the Euston masterplan, especially when factoring in the cumulative requirements of the affordable housing and other such policies.

Open Space

Policy SC3 sets out the quantum of open space that will be required via different forms of development and explains that priority is given to the delivery of new public open space on-site, with off-site provision being an option if it can be sufficiently explained to the LPA.

We note that **Policy SC4** additionally sets down a new metric to secure the provision of suitable space for on-site food growing by residents as part of all major housing and mixed-use developments. This will place additional pressure on the space within the masterplan area that is required to contribute to open space/play space. At present, **Policy SC4** does not draw upon any published evidence to qualify the inclusion of the policy in the Local Plan.

Additional flexibility should be written into **Policy SC3** to recognise that making improvements to existing open space off-site could be a mechanism to offset open space/play space/food growing requirements onsite where onsite space is constrained. Again, the cumulative impact of policies such as these may undermine the ability to maximise land receipts and fund the HS2 station, and there should be sufficient flexibility within the policy to understand the impact these requirements may have on the Euston scheme and its viability, as well as the usual operational requirements of active train tracks and stations.

Climate Change

Policy CC2 sets out that the repurposing, refurbishment, and re-use of existing building/s is prioritised over demolition. Part Eii of the policy sets out that the LPA will only permit proposals that involve the partial or substantial demolition of existing building/s, where it can be demonstrated to the LPA’s



satisfaction that the applicant has comprehensively explored a range of alternative development options, prior to considering full or partial demolition. However, we feel that the requirement to “explore a range of alternative development options” is not flexible enough and should also cater for situations where the demolition of a building would facilitate the delivery of other strategic infrastructure, as is the case with 1 Eversholt Street and the HS2 station. There should be sufficient flexibility within the policy to understand the impact these requirements may have on the Euston scheme and its viability, and also acknowledge the other sustainable transport benefits that are being facilitated by the project.

Tall Buildings

Policy D2 highlights that the LPA defines tall buildings as buildings that are over 40 metres in height in the CAZ and over 30 metres elsewhere in the borough. Whilst it is recognised that policy D9 of the London Plan indicates that appropriate heights for tall buildings should be specified in Local Plans, we consider that any stated parameters for the heights of tall buildings within **Policy D2** should be indicative. Our suggested approach would recognise that ultimate proposed heights on key sites like Euston which must optimise massing and quantum to generate value, will be arrived at through in-depth analysis and consultation and considered in the context of the public benefits it can offer. This best occurs at the planning application stage and the Local Plan’s tall buildings policy should be sufficiently flexible to enable this. The policy should be required to acknowledge the presence of other tall buildings in the local context and how they may provide a datum for height on the Euston site, and introduce flexibility that may be coming forward as part of the London Plan LVMF review.

It is recognised that the Euston Area Plan update sets out the policy approach to tall buildings in the designated Euston area and identifies locations where tall buildings may be an appropriate form of development. As such, we will provide further comments on the Euston Area Plan update in relation to tall buildings in the summer 2024 consultation.

Thank you for the opportunity to submit these representations and we would welcome being involved in preparation of the new Local Plan going forward.

Yours faithfully

DP9 Ltd.

DP9 Ltd.

Planning Policy Team
London Borough of Camden
2nd Floor
5 Pancras Square
N1C 4AG



By email to: PlanningPolicy@camden.gov.uk

Date: 13 January 2023

Dear Planning Policy Team,

CAMDEN LOCAL PLAN REVIEW – INITIAL CONSULTATION

Thank you for the opportunity to respond to the initial consultation on the review of the Camden Local Plan. These representations are being submitted on behalf of our client, Lendlease (the Master Development Partner for Euston), and the Euston Landowners.

Lendlease and the Euston Landowners are currently engaged in detailed pre-application discussions with the Local Planning Authority (hereafter 'the LPA') and the Greater London Authority (hereafter 'the GLA') in relation to the comprehensive redevelopment of Euston to create a world-class transport interchange with new homes, jobs, retail, leisure and cultural facilities. Lendlease and the Euston Landowners welcome the opportunity to be involved in the Local Plan preparation as a key stakeholder within the Borough, particularly given the likely importance of Euston to meeting the objectives and policies in the Plan.

In principle we support the review of the Camden Local Plan in order to reflect changes to national and London Plan policy, the climate crisis and the adoption of the Council's corporate strategy ('We Make Camden'). We would, however, like to make some high-level comments as to how the Local Plan can support the successful delivery of transformational regeneration at Euston, as envisaged by the London Plan and adopted Camden Local Plan.

We have previously submitted representations to the Draft Site Allocations Local Plan (SALP) Document Consultation in March 2020, which should be read in conjunction with these representations.

Relationship with the Euston Area Plan

On 14 December 2022, Camden's cabinet approved a public consultation on a draft review of the Euston Area Plan (hereafter 'the EAPR'). This public consultation is now live and closes on the 19th February 2023. We appreciate that the EAPR is where the majority of detailed policy regarding Euston will be contained, and that the new Local Plan is likely to contain a limited amount of Euston-specific policy. However, given that the Local Plan Review is likely to have reached at least draft stage by the time the Outline Planning Application for Euston is determined, it is important that the Local Plan Review and the EAPR are consistent and that any policy targets are carefully considered in the context of Euston to ensure that there are no unintended consequences for delivery of the Masterplan.



The LPA has acknowledged in the EAPR document itself that if delivered at the scale envisaged in the EAPR, development would not be deliverable as a whole based on current day costs and values and in light of the extraordinarily high enabling costs. Though there is an assumption throughout the EAPR of ‘future viability’ (an approach we have questioned, and which will be detailed in our formal representations to the EAPR), it is clear that achieving comprehensive redevelopment of Euston which meets the aspirations of policy at all scales is challenging. The review of the Local Plan needs to involve careful consideration of the cumulative burden of policies, obligations and other requirements which will be applied to Euston. This is especially important as it is likely that the LPA will be seeking to rely on the successful delivery of Euston when deriving housing and workspace target requirements for the Borough as a whole.

The need for flexibility

We strongly support the current objective in the Local Plan to direct the majority of growth to the Borough’s Opportunity Areas and recognise the need to deliver a substantial number of homes at Euston. However, we contend that flexibility needs to be built into how this is delivered over the life of the project and welcome the consultation website statement on ensuring that *‘policies are flexible enough to respond to change’*.

The Local Plan should reiterate the aim for Euston to become a significant commercial hub for the Knowledge Quarter alongside other industries. This will need to be balanced against the need to deliver significant numbers of homes, taking into consideration the complexities of delivery over a station environment with strategic transport infrastructure. It is suggested that the overall growth figures for these areas are expressed as broad ranges to allow flexibility, as necessary, for the delivery of a higher number of homes or jobs, as per the approach in the draft Euston Area Plan.

We support reference within the supporting text to the delivery of a range of housing products in terms of tenure, unit size, accessibility and affordability. We consider that flexibility should be ‘built in’ to these policies to allow long-term regeneration schemes such as Euston to adapt to changing circumstances and market requirements over time.

Clear and deliverable policies for the Knowledge Quarter

We have submitted representations to the Site Allocations document (specifically Policy KQ1 in relation to the Knowledge Quarter). For completeness, we reiterate here that we fully support the Knowledge Quarter designation and the prioritisation of commercial floorspace for priority growth sectors. As set out in our previous representations, we consider that any policy which seeks to set a target quantum for affordable workspace for the Knowledge Quarter should clarify that the amount of affordable workspace on individual schemes should be determined by reference to scheme viability.

Tall Buildings – London Plan Policy D9

Whilst it is recognised that policy D9 of the London Plan indicates that appropriate heights for tall buildings in suitable locations should be specified, the new Local Plan should contain some flexibility for Euston. We consider that any stated parameters for the heights of tall buildings should be indicative, recognising that ultimate proposed heights on key sites, especially those where large-scale masterplans apply, will be arrived at through in-depth analysis and consultation and considered in the context of the London Plan and Camden’s strategic aspirations for this site and the public benefits it can offer. This



best occurs at the planning application stage and the Local Plan's tall buildings policy should be sufficiently flexible to enable this.

Thank you for the opportunity to submit these representations and we would welcome being involved in preparation of the new Local Plan going forward.

Yours faithfully

DP9 Ltd.

DP9 Ltd.

Date: Fri, 27 Jun 2025 15:36:47 +0000

From: John Murphy

To: PlanningPolicy

Subject: Camden Local Plan - Proposed Submission Draft 2025 Representation
Form

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Daryll"/>	<input type="text"/>
Last Name	<input type="text" value="Westen"/>	<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"/>

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: DNA Architecture 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	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) - ASUC Representation on Camden Local Plan Proposed Submission Draft - 27 June 2025

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

(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.

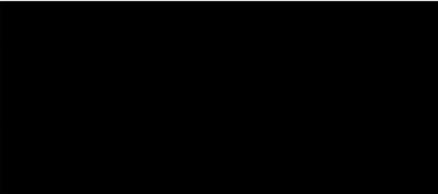
(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

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

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

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

11. Signature:			Date:	26 th June 2025

Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

- **Positively prepared**

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

Date: Fri, 27 Jun 2025 16:34:59 +0100
From: Daniel Bekele
To: [redacted], Lindsey Dahlgren
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Dear Sir or Madam,

I am reaching out to share my objection to the planned Adelaide Road (Gypsy & Traveller site).

Objections to Site C27: A Vital Community Space Under Threat

Developing Site C27 would severely detriment the local community and environment. This proposal contradicts numerous planning policies and ignores the site's critical role as a public amenity, green space, and play area.

Loss of Essential Amenity and Open Space

The site is an integral part of the open space and amenity area serving Constable House and surrounding residents. Its loss would be a significant blow to the **amenity of a dense urban location**, depriving residents of much-needed accessible outdoor space.

Destruction of Local Green Space and Biodiversity

This isn't just an open plot; it's a vital **Local Green Space/Open Space** boasting mature trees and wildflowers. In recent months, the site has been enhanced with fruit trees and wildflowers as part of the "Communi-Trees" project—a local initiative involving the KOKO Foundation, Think & Do, and Camden Council. This project not only creates urban orchards but also engages local young people in their upkeep. The proposed development would **completely remove these new plantings** and lead to the destruction of **30 to 60 mature holly trees**, devastating local biodiversity.

Irreplaceable Loss of Playground Facilities

The area was specifically constructed and is actively used as a **playground** for Constable House residents and the wider community. Historically, it has been identified on Ordnance Survey Maps as a playground. Developing this site would mean the **loss of a crucial play facility with no viable alternative** nearby.

Significant Overlooking and Privacy Concerns

The site is heavily **overlooked from all directions**:

- **East:** Residents of the 4/5 storey Constable House.
- **North:** Residents of Provost Road.
- **West:** Residents of the 6-storey Etons and the new residential block under construction at 5-17 Haverstock Hill.
- **South:** Residents of Primrose House and Bridge House Adelaide Road.

Adelaide Road, a key east-west route and busy bus route, further exacerbates privacy concerns for any development on this site.

Unacceptable Flood Risk

The site lies within a **flood risk zone** and has experienced significant flooding across the play area recently. Developing this site would be **contrary to Paragraph 13 of the Government Traveller Sites Planning Policy**.

Inadequate Access and Residential Disruption

There is **no independent access to the site**, meaning any development would cause **serious disruption to residents of Constable House**. Furthermore, potential access would be immediately opposite the entrance to Eton Place, creating additional traffic and safety concerns.

Lack of Consideration for Local Infrastructure

There is **no evidence that the availability of places at nearby schools has been considered**, raising significant concerns about the impact on local educational infrastructure.

Non-Compliance with Planning Policies

The proposal for Site C27 appears to disregard the **constraints outlined in Table 1 of the Gypsy and Traveller Site Identification Study**, particularly concerning:

- Council house-owned homes and residential garden land
- Local Green Space
- Open Space
- Overlooking
- Playgrounds

Moreover, this proposal is inconsistent with other policies in the draft Camden Plan, which explicitly aims to:

- Provide new and/or improved sport and leisure facilities for young people.
- Deliver new and enhanced areas of open space and play space, and improved access to nature.
- Enhance greening and biodiversity.
- Deliver flood mitigation measures and sustainable drainage systems.

Failure in Public Consultation

Crucially, there has been **no consultation with local residents** regarding the proposed use of this site. Most residents, including those in the Etons and Constable House, remain unaware of these significant proposals.

Conclusion

For all the reasons detailed above, the Camden Draft Plan **must be modified to delete Site C27**. This site is a valuable and irreplaceable community asset, and its proposed development would cause unacceptable harm to residents and the local environment.

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

Date: Fri, 27 Jun 2025 16:37:48 +0100

From: Lindsey D

To: [redacted]

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

I am reaching out to share my objection to the planned Adelaide Road (Gypsy & Traveller site).

PERSONAL DETAILS

Name: Lindsey Dahlgren



Objections to Site C27: A Vital Community Space Under Threat

Developing Site C27 would severely detriment the local community and environment. This proposal contradicts numerous planning policies and ignores the site's critical role as a public amenity, green space, and play area.

Loss of Essential Amenity and Open Space

The site is an integral part of the open space and amenity area serving Constable House and surrounding residents. Its loss would be a significant blow to the **amenity of a dense urban location**, depriving residents of much-needed accessible outdoor space.

Destruction of Local Green Space and Biodiversity

This isn't just an open plot; it's a vital **Local Green Space/Open Space** boasting mature trees and wildflowers. In recent months, the site has been enhanced with fruit trees and wildflowers as part of the "Communi-Trees" project—a local initiative involving the KOKO Foundation, Think & Do, and Camden Council. This project not only creates urban orchards but also engages local young people in their upkeep. The proposed development would **completely remove these new plantings** and lead to the destruction of **30 to 60 mature holly trees**, devastating local biodiversity.

Irreplaceable Loss of Playground Facilities

The area was specifically constructed and is actively used as a **playground** for Constable House residents and the wider community. Historically, it has been identified on Ordnance Survey Maps as a playground. Developing this site would mean the **loss of a crucial play facility with no viable alternative** nearby.

Significant Overlooking and Privacy Concerns

The site is heavily **overlooked from all directions**:

- **East:** Residents of the 4/5 storey 
- **North:** Residents of .

- **West:** Residents of the 6-storey [redacted] and the new residential block under construction at 5-[redacted address].
- **South:** Residents of [redacted].

Adelaide Road, a key east-west route and busy bus route, further exacerbates **privacy concerns** for any development on this site.

Unacceptable Flood Risk

The site lies within a **flood risk zone** and has experienced significant flooding across the play area recently. Developing this site would be **contrary to Paragraph 13 of the Government Traveller Sites Planning Policy**.

Inadequate Access and Residential Disruption

There is **no independent access to the site**, meaning any development would cause **serious disruption to residents of Constable House**. Furthermore, potential access would be immediately opposite the entrance to Eton Place, creating additional traffic and safety concerns.

Lack of Consideration for Local Infrastructure

There is **no evidence that the availability of places at nearby schools has been considered**, raising significant concerns about the impact on local educational infrastructure.

Non-Compliance with Planning Policies

The proposal for Site C27 appears to disregard the **constraints outlined in Table 1 of the Gypsy and Traveller Site Identification Study**, particularly concerning:

- Council house-owned homes and residential garden land
- Local Green Space
- Open Space
- Overlooking
- Playgrounds

Moreover, this proposal is inconsistent with other policies in the draft Camden Plan, which explicitly aims to:

- Provide new and/or improved sport and leisure facilities for young people.
 - Deliver new and enhanced areas of open space and play space, and improved access to nature.
 - Enhance greening and biodiversity.
 - Deliver flood mitigation measures and sustainable drainage systems.
-

Failure in Public Consultation

Crucially, there has been **no consultation with local residents** regarding the proposed use of this site. Most residents, including those in the Etons and Constable House, remain unaware of these significant proposals.

Conclusion

For all the reasons detailed above, the Camden Draft Plan **must be modified to delete Site C27**. This site is a valuable and irreplaceable community asset, and its proposed development would cause unacceptable harm to residents and the local environment.

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

Lindsey Dahlgren

[REDACTED]

Date: Fri, 27 Jun 2025 16:40:15 +0100

From: Bruno Demartino

To: [redacted]

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

Thanks,

Bruno Demartino

[redacted address],



Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Bruno"/>	<input type="text"/>
Last Name	<input type="text" value="Demartino"/>	<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: Bruno Demartino

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

Documents can be found at the following links:

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

Paragraph Policy Policies Map

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

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

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

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

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

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

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

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

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

- This local green and open space is an important green area for the local community. It provides a welcoming green environment when you exit Chalk Farm station, a noticeable contrast to the more built-up view to the east. With its mature trees and wildflowers, this site offers much-needed greenness and openness for residents of Constable House and the wider area, especially given how dense this urban location is. The site's greenness has recently been enhanced through the "Communi-Trees" project, a partnership involving KOKO Foundation, Think & Do, and Camden Council. This initiative has added fruit trees and wildflowers, contributing to a network of orchards across Camden and involving local young people in their care. Developing this site would mean losing all of this new planting, along with many mature holly trees, further reducing the vital greenness of the area. Beyond its natural features, this Open Space also serves as a crucial playground, regularly used by Constable House residents and other local families.
- The site is overlooked from all directions. To the east, it's overlooked by residents of the 4/5 storey Constable House. To the north, Provost Road residents have a view of the site. From the west, residents of the 6-storey Etons, along with the new residential block currently under construction at 5-17 Haverstock Hill, will look down onto the site. Finally, to the south, residents of Primrose House and Bridge House on Adelaide Road have sight of the area. Adelaide Road itself, a busy east-west route and bus lane, borders the site to the south, which affects the site's privacy.
- There appears to be no evidence on how the area would impact the new site, or vice versa. For example the site is next to an already busy road that would impact on the residents; there are many residential block accesses around and it's not clear how independent access would be added or how it would impact other accesses; the site is in a flood risk zone (with recent significant flooding across the play area); if available school places have been considered; if the site would be viable considering the small space available.

In general, the proposal of this site seems to go against many of the guidelines and requirements set out in other sections of the Local Plan. For example the proposed site does not meet the conditions set out in section D of policy H11. The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Additionally there hasn't been consultation with the local residents regarding this proposed site. For example it looks like most residents of close-by residential blocks (i.e. Constable House and The Etons) are unaware of this proposal.

(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.

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

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:	Bruno Demartino	Date:	27/06/2025
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

- ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

Date: Fri, 27 Jun 2025 16:42:24 +0100

From: Anushka Gunawardena

To: [redacted], [redacted]

Subject: Confidential: my opposition to the proposed traveller site near Constable House

[REDACTED]

27th June 2025

Dear Sir/Madam,

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

I live [REDACTED], [REDACTED]. For the reasons outlined below, I strongly feel that the allocation of Site C27 fails multiple policy tests.

It lacks a transparent or a defensible basis. I also believe 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.

PERSONAL DETAILS

Name: Anushka Gunwardena

[REDACTED]
[REDACTED]

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 those in The Etons and Constable House – seemed to be completely unaware of the proposal until very recently – suggests a lack of transparency and failure to properly consult all affected parties, which weakens the legitimacy of the allocation and risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

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

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

7. Inconsistent with other policies in the draft Camden Plan

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

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

8. Better Alternatives Exist

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

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

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

MODIFICATION PROPOSED

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

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

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

PARTICIPATION IN THE EXAMINATION HEARINGS

I wish to participate at the examination hearings in order to ensure that the interests and views of the residents and owners of the [redacted] are faithfully represented.

Thank you in advance for taking on board my representation and those of other related parties, both within The Etons and in the neighbourhood generally.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Anushka Gunawardena

Date: Fri, 27 Jun 2025 17:43:55 +0200
From: Michelle Mahmood
To: [redacted]
Subject: Travellers site - Eton College Road

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

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

Dear Sir/Madam,

I am writing to express my objection for the proposed relocation of travellers to the corner of Eton College Road/Adelaide Road. [redacted] and strongly disagree that the small area proposed by the council to accommodate part of the traveller community would be suitable. The site is very small, is already partly used by the children/youths of Constable House, and is far too close to Chalk Farm station and Camden where the residents are currently dealing with issues concerning drug use/dealing and vagrancy.

Furthermore, there has been no consultation with the residents concerning this proposal which I find deeply concerning.

I urge you to please remove this small area of land from the list of possible relocation sites.

With kind regards,
Michelle
[redacted address], [redacted postcode]

Date: Fri, 27 Jun 2025 15:44:10 +0000
From: Rebecca Filer (Cllr)
To: PlanningPolicy
Subject: Haverstock ward councillors - Site C27

Hello,

We are writing as the three councillors for Haverstock ward on the allocation of land adjacent to Constable House as Gypsy, Roma and Traveller accommodation. We recognise that what is being proposed is not a planning application, which has its own process, but a consultation on the Draft Local Plan.

The land that has been allocated for Gypsy, Roma and Traveller accommodation forms part of the Constable House estate and is attached to the block, with windows looking out over it. Currently, this piece of land is intended as a recreational space for residents of the estate.

In the process of allocating this site, we are not confident that a detailed assessment has been done on the viability or suitability of the site, nor has there been any direct engagement with the residents of Constable House on what their views are on shaping their estate.

Should this site be taken forward, it will not have taken into account of the following:

- Overlooking: The flats on the edge of Constable House have windows that look directly onto the site. This means that it would be looked down on by Constable House residents raising issues of overlooking, lack of privacy and noise. Additionally, the site sits on Adelaide Road and close to Chalk Farm station, one of the busiest routes in Camden which would bring noise and disruption. In Camden's assessment of the site, the overlooking is recognised as a constraint from the blocks of flats on Eton College Road. However, the assessment fails to mention the direct overlooking from windows on Constable House, showing the lack of proper investigation of the site as if it had been visited and assessed it would have been discounted for this reason and it would be included in the site assessment. Other sites were excluded as unsuitable if they were less than 18m distance from a building more than 12m or 4 storeys in height, where a fence cannot be expected to mitigate issues of overlooking (p12 <https://www.camden.gov.uk/documents/d/guest/gypsy-and-traveller-site-identification-study>). There is a clear error in the inclusion of this site as the initial study did not account for the 4 storeys of windows alongside the edge of Constable House and therefore it should not have been brought forward as an appropriate site.
- Access to the site and suitability: We are sceptical of the ability to make the site suitable for allocation. It is a very tight space with no easy access routes as it sits below the level of the road access to Constable House. Camden's own assessment of the site includes that it has potential as a flood risk (Gypsy and Traveller Site Identification Study Appendices).
- Loss of leisure space: This land should be classified as open space, which is what it is supposed to serve as on the Constable House estate. In the site assessment, it lays out that sites were excluded if they are classed as Local

Green Space, Open Space and Playgrounds. It is unclear therefore why this site has been brought forward as this is what it is intended for use as.

- Consultation with Constable House: In Camden we believe in working with our residents on estates to shape the places in which they live. This principle has not been applied in the site allocation process. No direct consultation has been carried out with residents, relying only on the general borough-wide consultation on the Draft Local Plan.

We ask that the Planning Inspectorate remove site C27.

Best wishes,

CLlr Kemi Atolagbe, CLlr Nasrine Djemai, CLlr Rebecca Filer

Councillor Rebecca Filer

Labour Councillor for Haverstock

Web: camden.gov.uk



Office address:
London Borough of Camden
London [redacted postcode]

Please consider the environment before printing this email.

Responder 627

Date: Fri, 27 Jun 2025 15:44:53 +0000
From: Luv Shah
To: planningpolicy@camden.gov.uk
Subject: Gypsy & Traveller site objection

OBJECTION TO GYPSY & TRAVELLER SITE (SITE C27) IN CAMDEN LOCAL PLAN

Name: Luv Shah

[REDACTED]

OUR REASONS TO OBJECT:

1. Loss of a valued community green space

This site has been beautifully planted with wildflowers and young trees by Communi-trees, a grassroots greening project started by the KOKO Foundation whose ambassadors include Benedict Cumberbatch, Stormzy, Dua Lipa, Olivia Colman and others.

While it isn't formally designated as open space, in practice it absolutely functions as one. It's used regularly by families and neighbours as informal play space and a quiet communal area, particularly by residents of nearby flats with no private outdoor access. Losing this space would significantly reduce already-scarce green amenity in the area, especially for children and older people.

Its loss would go against:

- NPPF Paragraphs 99–101
- London Plan Policy S4
- Camden Local Plan Policy A2(e)
- Relevant case law (e.g. *Copas v RB Windsor and Maidenhead* [2001])

2. Overlooking and Privacy Concerns

The site is tightly bordered by multi-storey housing, including Constable House, Eton Hall, Eton Rise and Eton Place. It's directly overlooked by dozens of windows and balconies.

Alongside the ongoing disruption from construction next to Chalk Farm Station and a heavily used e-scooter/bike rank just a metre away, placing new residential use here would create unacceptable conditions for both existing residents and future occupants.

This conflicts with:

- Camden Planning Guidance on Amenity (2021)
- PPTS Paragraph 13(c)
- Article 8 of the ECHR (right to privacy and family life)
- *Moore v SSCLG* [2013] highlighting the need to consider mutual amenity impacts in Traveller site decisions

3. Flood Risk - Inappropriate for Highly Vulnerable Use

C27 sits within a Local Flood Risk Zone (LFRZ), and Camden's 2021 surface water data flags the area as flood-prone. Traveller pitches are classified as a "Highly Vulnerable Use" under national guidance.

The proposal doesn't meet the required sequential or exception tests and would breach:

- 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 Issues and Undeliverability

There's no proper vehicular access to the site. It's only reachable via narrow estate paths, which are not suited for trailers, vehicles, or emergency services. This makes the proposal practically undeliverable.

It fails to meet:

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

5. A Lack of Transparency in the Selection Process

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 sites. Only two made it into the Regulation 19 Draft Plan, but no clear explanation was given as to why.

What's more, Site C27 was not included in previous consultation rounds. Many local residents, myself included, only learned of its proposed allocation in May 2025 - too late for proper engagement.

This lack of openness undermines public trust and appears to conflict with NPPF Paragraph 16(d), which requires clear justification and transparency in plan-making.

6. Site Contradicts the Council's Own Assessment Criteria (GTSIS Methodology and Exclusion Criteria)

The AECOM methodology filtered out sites that:

- Are within 18m of 4+ storey buildings
- Are used as informal amenity/play space
- Have identified flood risk

- Lack safe vehicle access

C27 meets all four of those exclusion criteria. Its inclusion contradicts the Council's own assessment logic and compromises the credibility of the evidence base.

7. Other, More Suitable Options Were Dismissed

Out of the 21 sites shortlisted, we've been given no meaningful explanation for why 19 were rejected and why C27 was carried forward, despite its clear problems with access, amenity loss and flood risk.

The April 2025 Site Selection Topic Paper mentions these same issues as reasons for excluding other sites, yet offers no comparative analysis or scoring to justify C27's inclusion.

The plan has therefore not met the NPPF tests of:

- Justification (why this site over others);
- Effectiveness (deliverability);
- Consistency (application of methodology, have the rules been applied fairly?).

Conclusion and Requested Action

Site C27 does not stand up to scrutiny. It presents clear issues around amenity loss, flood risk, privacy, and access, and has emerged from a selection process that has not been transparent or consistent.

It fails the national policy tests of justification, effectiveness and consistency under NPPF Paragraph 35.

I'm therefore asking that Site C27 be removed from the Camden Local Plan submission draft, specifically from:

- Chapter 4 Central Camden – Table 5
- Chapter 7 – Policy H11
- The Draft Policies Map and Site Allocations Schedule

I hope the Council and Inspectorate will commit to reconsidering more suitable alternatives, through a transparent process that meaningfully includes local residents.

Kind regards,

Luv Shah



Date: 27/06/2025

Responder 628

Date: Fri, 27 Jun 2025 15:45:31 +0000

From: Katharine Woods

To: PlanningPolicy

Subject: London Borough of Camden: Draft Local Plan Regulation 19 Consultation
Representations (Kilburn and District Properties Limited)

Our Ref: DGM/KFW/DP6387

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



27th June 2025

Dear Sir/Madam,

**CAMDEN POINT, 25 – 27 CAMDEN ROAD, LONDON NW1 9LN
REPRESENTATIONS TO THE DRAFT NEW CAMDEN LOCAL PLAN (REGULATION 19) CONSULTATION**

On behalf of our client, Kilburn and District Properties Limited, we write to formally submit our representations to the London Borough of Camden's ('LBC') Draft Local Plan (Regulation 19) consultation. These representations follow on from our submissions to the previous round of consultation on the draft Local Plan, including the Call for Sites.

We welcome the amendments made to the draft Site Allocation (Ref: C16) for Camden Point (also known as Shirley House) in the draft Local Plan. This reflects our clients aspirations to deliver student accommodation in this location and contribute towards the borough's delivery pipeline.

The primary purpose of these representations is to set out further clarifications to inform the current draft Site Allocation and include suitable wording to reflect the redevelopment opportunities for the Site. In addition, these representations also provide further commentary on associated policies as part of ensuring that the draft Local Plan is consistent with the relevant tests of soundness¹.

Background

Kilburn and District Properties Limited are the owners of Camden Point (also known as Shirley House) in LBC. The Site was previously occupied by the British Transport Police until December 2024 when they vacated the Site. It is situated within the Regent's Canal Conservation Area and located outside of Camden Town's Centre and the Central Activities Zone ('CAZ'). By proximity to the Regent's Canal, it also sits adjacent to a designated Site of Important Nature Conservation ('SINC') and Habitat Corridor.

Draft Site Allocation

Shirley House is identified under Site Allocation Ref: C16 for purpose-built student accommodation ('PBSA'). We strongly support the overall aspirations of the Site Allocation and the principle of PBSA on the Site as an alternative to offices.

As per our previous representations on the Regulation 18 consultation version of the Local Plan, the Site comprises of a purpose-built office building which is no longer viable in its current form and condition, and

¹ See National Planning Policy Framework 2024 (Paragraph 36).



the cost of upgrading the building to achieve an EPC Rating of B (as required by 2030) would be unviable when considered against the future rents which the building could secure.

Having reached the end of building's current life, it is now critical to secure both a viable and deliverable scheme which positively contributes towards the objectives of Camden's emerging draft Local Plan.

In the above context, the applicant team have been exploring a student-led scheme for the Site, which includes the retention and extension of the existing building. These proposals closely align with the aspirations of the draft Site Allocation and have been presented to officers in recent pre-application discussions. On this basis, we do not seek any substantive changes to the description of the Site Allocation beyond noting the Site is currently vacant since British Transport Police relocated to new premises in December 2024.

We would also note that whilst the capacity study for the Site has not been published, based on the pre-application proposals which have been developed by AHMM, we considered that there is scope for the Site to deliver a minimum of 300 student beds. This is based on the retention and extension of the existing building and would further contribute towards Camden's needs over the lifetime of the new Local Plan. We welcome the opportunity to discuss these proposals further with the policy team.

Draft Planning Policy

Tall Buildings

Draft Policy D2 sets out the appropriate locations of tall buildings (inclusive of any rooftop structures) across the borough. This establishes two datum heights comprising of 40 metres within the Central Activities Zone ('CAZ') and 30 metres elsewhere in the borough. The Policy also refers to site locations where tall buildings may also be appropriate subject to meeting other requirements of the Local Plan (Table 12).

We consider that the site allocation for Camden Point should also be included as part of the list of appropriate sites for tall buildings. At present, the Site would just sit below the threshold of the tall building definition. Given that the draft Site Allocation rightly identifies opportunities to retain and extend the building as part of delivering new student accommodation, it would be appropriate in this instance to include the Site within Table 12, noting that the height and design of the proposals would necessarily take into account other Local Plan policies as part of delivering an appropriate and successful design in this location.

Student Accommodation and Affordable Housing

We support the principle of affordable housing delivery in appropriate locations across Camden. As set out Part 13 of draft Policy H9 states that proposals for PBSA should provide affordable student accommodation or otherwise provide an "*appropriate*" contribution towards affordable housing in accordance with Policy H4(d).

Part d of draft Policy H4 sets that where development of PBSA is proposed, the Council will apply the "*distinctive affordable housing provision of the London Plan*". As an alternative, the Council will strongly encourage "*contributions*" towards self-contained homes in accordance with the guideline mix on tenures under H4(b)(6). Further commentary is set out in the supporting text at Paragraphs 7.145 and 7.146.

At present we consider that further clarity should be set out in Part d of Policy H4 and supporting text regarding the fast-track approach when assessing the provision of self-contained affordable homes as part of alternative residential accommodation including PBSA. At present, whilst contributions may be sought from these developments in accordance with H9, it is unclear in what the threshold is for such proposals



to meet the fast-track requirements. In addition, further evidence to support the justification for the proposed % contribution for such schemes should also be provided.

Lastly, in circumstances where the contribution towards self-contained affordable housing on-site is below the prescribed threshold (for reasons of site constraints or otherwise), further clarity is required on whether off-site provision or a payment in-lieu will be required as a 'top-up' to meet the fast-track requirements.

Such changes are deemed necessary in order to make the current draft Local Plan *justified* and *effective* in accordance with the tests of soundness set out in the NPPF.

Summary

We support the overarching aims and objectives of the draft Local Plan. As set out in these representations we strongly endorse the draft Site Allocation for Camden Point. In this context, we welcome the opportunity to discuss our proposals with officers in the policy team as part of demonstrating how the Site can be optimised through good design to deliver a minimum of 300 student beds. In addition, we would request that the current Site Allocation is also included within Table 12 of Policy D2 in recognition of the current height of the existing building and opportunities to retain and extend the building as set out in the Site Allocation.

We would also encourage further clarity be provided in relation to the Council's expectation for self-contained affordable housing delivery on qualifying PBSA schemes. We trust our comments will be taken on into consideration as part of the Regulation 19 consultation and look forward to engaging with you and colleagues in due course. Should you have any questions or would like to discuss further, please contact Katharine Woods or David Morris at this office.

Yours faithfully,



DP9 Limited

Responder 629

Date: Fri, 27 Jun 2025 15:45:37 +0000

From: Anabelle

To: PlanningPolicy

Subject: Regis road recycling center relocation objection

Dear Camden Council Regeneration and Planning Teams,

I hope this message finds you well.

My husband Mike and I wanted to contact you as long-term [REDACTED] residents and homeowners [REDACTED], Kentish Town to express our strong objection to the proposed relocation of the Regis Road Recycling Centre to a site directly adjacent to residential properties, including our own.

While we fully support Camden's healthy street scheme we are extremely concerned about the proposed location of the facility and its potential negative impacts on our community. We have prepared the below points which we feel will support this request:

1. Impact on Residential Life: Locating a heavy-use industrial facility such as a Recycling Centre within immediate proximity to homes is incompatible with the character and purpose of the area. This would bring constant noise, odour, and heavy vehicle traffic into a quiet residential setting and significantly degrade quality of life for families, elderly residents, and others.
2. Serious Safety Concerns for Children and Schools: Holmes Road and its surroundings are home to several schools, including St Patrick's Primary School and the Collège Français Bilingue de Londres (CFBL) which our two children attend since the age of 5. Increased heavy vehicle traffic associated with the Recycling Centre poses a serious safety risk to young children commuting on foot, scooter, or bicycle. Our Camden community has worked hard to create a Healthy School Street environment, which has already brought measurable benefits in reducing traffic and pollution around these schools. This proposal would directly jeopardize those gains and place children at increased risk.
3. Undue Financial Impact on Residents: Placing a Recycling Centre next to homes will inevitably depress property values, make homes harder to sell, and complicate refinancing. For many, their home is their main financial security. This decision could have long-term financial consequences for hundreds of residents - an unfair and disproportionate burden.
4. Flawed Consultation Process: The November 2024 consultation process appears to have been poorly communicated and unrepresentative of residents in the immediate vicinity. Many of us were either unaware of it or unable to meaningfully contribute. Basing major planning decisions on such a narrow and arguably misleading data set undermines trust in the Council's engagement with the local community.
5. Better Alternatives Are Available: It is also worth noting that Islington's Holloway Road Recycling Centre is larger and better equipped than the Regis Road facility. I have been made aware that there have previously been discussions about consolidating recycling operations between boroughs - an idea which merits renewed consideration. In this context, relocating the facility to a more appropriate industrial zone or considering a shared solution with Islington seems far more pragmatic than placing it on the doorstep of residents and schoolchildren.

In conclusion, I urge you to pause and reconsider this proposal. A Recycling Centre is a necessary part of borough infrastructure - but its location should not come at the expense of children's safety, residents' well-being, and sound urban planning principles.

I welcome further dialogue and would appreciate the opportunity to engage in any upcoming consultations on the matter.

Kind regards,
Anabelle Rodrigues Eberhardt,

