

Date: Mon, 23 Jun 2025 22:45:15 +0200

From: Sam Khan

To: [redacted]

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

Name Sam Khan

[redacted]

[redacted]

[redacted email]

OUTLINE OF OBJECTION/REPRESENTATION

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

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

REASONS

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

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

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

Conclusion

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

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

Sam Khan

Date: Mon, 23 Jun 2025 21:03:40 +0000
From: Majella Fawle
To: PlanningPolicy
Subject: Proposed traveller site

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Hello,

I would like to comment on the proposal for a traveller site on Adelaide Road, east of Constable House. I understand the need for the provision of sites for travellers but feel strongly that the proposed site is completely unsuitable for the following reasons:

1. The site is overlooked by Constable House and nearby properties with associated privacy concerns for the travellers
2. There is a probable lack of light to the lower floor apartments of Constable House due to the proximity of the travellers' trailers and caravans.
3. There is the likelihood of noise and light issues for the residents of Constable House.
4. Adelaide Road is a very busy road with a high degree of traffic and regular traffic jams leading to the traffic lights at Chalk Farm.
5. There is the potential for railway noise as the site is very close to the railway line to Euston and noise from ongoing HS2 works. There is greater noise transference through the walls of trailers and caravans than through the walls of houses.
6. The location is adjacent to a conservation area.

Regards,
Majella Fawle

Date: Mon, 23 Jun 2025 23:38:50 +0200
From: Gyorgy Szemere
To: [redacted]
Subject: Fwd: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

Dear Camden Council Planning Policy Team

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

I submit this email representing [redacted address] - located directly opposite the proposal- to object in the strongest possible terms to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being

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

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

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

3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

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Date: Mon, 23 Jun 2025 22:05:37 +0000

From: Alice Ahn

To: planningpolicy@camden.gov.uk

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

I am a resident at [redacted address], [redacted postcode].

I object to proposed plan for area for travellers in Adelaide Road/Eton College Road.

While I support Camden's efforts to provide space for this disadvantaged community, the selection of this site is wrong for a number of reasons.

- It is in an already crowded area next to Constable House and Eton Villas, and would be overlooked by buildings of more than [redacted address] and the new development next to Chalk Farm tube station.
- It is very small (and actually smaller than the minimum size that Camden themselves recommend).
- It is next to a main road, a railway and an ambulance run - making it an unpleasant location for new dwellings.
- It will be highly impacted by the HS2 works for the next decade and add extra traffic to the area during the works for this.
- It's an area of high footfall; everyone walking from Chalk Farm station to Primrose Hill across the bridge will walk past it, and it will be highly visible and lack privacy.
- It will mean loss of green space and a playground for the residents of Constable House who seem to know nothing about the plan.
- It will have a knock-on impact to the local community and Primrose Hill, including the policing of these areas.
- The Traveller community don't like it and fear losing their current accommodations as a result

Kind regards,

Alice Jiyeon Ahn

Responder 133

From:
To:
Subject:
Date:



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Dear Camden Planning Policy Team,

I am writing to formally object to the potential allocation of the land east of Constable House, as identified in the Gypsy & Traveller Site Identification Study.

This site is located within a densely populated area that already experiences significant footfall traffic and congestion due to visitors to Camden Town Market, Primrose Hill, and the Roundhouse music venue. The introduction of a traveller site would place undue pressure on the existing infrastructure and exacerbate current traffic issues.

Furthermore, the area currently includes wild flowers and serves as a valuable green space. Its removal would set a concerning precedent for the loss of green areas within this densely populated urban environment.

Finally, the study was conducted remotely, which would mean the location's crowds and context would not have come to light for the people undertaking the study. An in person assesment would quickly show how the location is not suitable.

Kind regards,
Daniel Apt



Responder 134

Date: Tue, 24 Jun 2025 00:43:50 +0100

From: Besa Sadiku

To: [redacted]

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

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

Part B – Please use a separate page for each representation

Name or Organisation: Constable House

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

Documents can be found at the following links:

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

Paragraph

4.5

Policy

Policies Map

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

(1) Legally compliant

Yes

x

No

(2) Sound

Yes

No

No

(3) Complies with the Duty to co-operate

Yes

x

No

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

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

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

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

x

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

x

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

(4) Consistent with national policy

x

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

6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to cooperate. 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.

- **RE: Objection to Proposed Development Adjacent to Chalk Farm Station C27**

- We write to raise formal objections to the proposed allocation and development of the green space adjacent to Chalk Farm Station, on behalf of concerned local residents. This site, while modest in scale, holds substantial value for the local community — visually, socially, and practically. We submit that the location is wholly unsuitable for the intended use, for the following substantive reasons:

- **1. Excessive Footfall and Public Exposure**

The site lies immediately adjacent to Chalk Farm Underground Station and forms part of the primary pedestrian thoroughfare linking to Primrose Hill. It is subject to consistently high foot traffic and lacks any form of acoustic or spatial buffer from the surrounding urban intensity. As such, it does not afford the calm or respite that would be expected of a suitable residential environment.

- **2. Severe Loss of Privacy**

The proposed location is directly overlooked by multiple residential buildings, including Constable House (4–5 storeys), The Etons (6 storeys), houses on Provost Road, Primrose House, Bridge House, and a new development on Haverstock Hill. Any future occupants would be exposed to constant visual intrusion, with no practical means of achieving privacy or quiet enjoyment of their premises. This environment fails to meet the standards of dignity, seclusion, and basic residential amenity.

- **3. Loss of Designated Green Space**

The area in question constitutes one of the last remaining green spaces in the immediate vicinity. It provides visual relief and environmental benefits in an otherwise densely developed area. Its removal would significantly diminish local amenity and run counter to current planning policies encouraging the preservation of urban green space.

- **4. Destruction of Community-Led Environmental Initiatives**

The site has recently benefited from community engagement through the planting of fruit trees and wildflowers under the Community Trees initiative. This project, supported by local youth, would be entirely eradicated by the proposed development, undermining public trust in future local environmental programmes.

- **5. Removal of Informal Play Area**

The space functions as an informal but vital play area for children from Constable House and neighbouring properties. There are no viable

alternative outdoor play spaces in the immediate area. The loss of this site would represent a significant detriment to the health and wellbeing of local children, contravening policies supporting child-friendly public spaces.

- **6. Inadequate Site Access and Traffic Implications**

Access to the proposed site is limited and raises significant concerns in relation to traffic flow, safety, and disruption. The proximity of the access point to residential buildings may pose a risk to both residents and future occupants, particularly in the absence of comprehensive traffic and service planning.

- **7. History of Flooding and Environmental Risk**

This site and its surrounding area have experienced recurring flooding, particularly around the informal play area. Development on this ground risks exacerbating local drainage issues, posing further environmental and structural concerns for both the site and adjacent buildings.

- **8. Lack of Educational and Service Provision Planning**

No clear consideration appears to have been given to local infrastructure, including the availability of school places and access to essential services. Such omissions render the proposed allocation procedurally and practically deficient.

- **9. Absence of Proper Public Consultation**

To date, there has been no meaningful or transparent consultation with local residents regarding the intended use of this site. This absence of engagement raises significant procedural fairness concerns and undermines the legitimacy of the proposal.

Conclusion

- In light of the above, we submit that the proposed use of this site is wholly inappropriate, incompatible with the needs and expectations of the community and likely in breach of several key planning principles.
- We request that the relevant authorities give these concerns due and urgent consideration and that the proposal be reconsidered or withdrawn accordingly.

- Yours faithfully,

Besa Sadiku Sinani

[Redacted Signature]

(Continue on a separate sheet if necessary)

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

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

Alternative Proposal for Site Use: Community Outdoor Fitness and Sports Facilities

In place of the proposed development, we respectfully suggest that the site be repurposed for a use that directly benefits the health and wellbeing of the local community—specifically, the creation of an outdoor activity zone incorporating a fitness gym and sports facilities such as a basketball court or multi-use games area (MUGA).

Such a transformation would serve multiple valuable purposes:

1. Promoting Physical Health and Wellbeing

An outdoor gym and sports facilities would encourage regular physical activity among residents of all ages, particularly children and young people. In an urban environment where access to open space is limited, providing a designated area for exercise and play is essential for maintaining a healthy lifestyle and preventing sedentary behaviours.

2. Supporting Youth Engagement and Safe Recreation

The addition of recreational facilities would offer a safe, structured alternative for children and teenagers, reducing the risk of anti-social behaviour and promoting social inclusion. Accessible sports amenities can have a profoundly positive impact on youth development, teamwork and mental health.

3. **Strengthening Community Cohesion**

A shared public space designed for active use would help bring together residents from diverse backgrounds, fostering a stronger sense of community. Whether through informal play, organised fitness classes or casual sports matches, such a facility would support interaction and engagement among neighbours.

4. **Maximising Long-Term Public Benefit**

Unlike temporary or short-term developments, recreational infrastructure offers ongoing value to the community. It aligns with local and national public health priorities and could be integrated into borough-wide wellbeing strategies. Additionally, well-maintained public sports spaces have been shown to enhance perceptions of safety and contribute to local pride in public spaces.

5. **Environmentally Responsible Use of Space**

An outdoor gym or sports court would preserve the open-air nature of the site, minimise overdevelopment and allow for environmentally sensitive landscaping around the facilities. This approach maintains visual openness while serving a high-impact community purpose.

We therefore urge the relevant authorities to explore this community-led alternative, which prioritises public health, inclusivity, and long-term social value. Such a use would be far more appropriate and sustainable in this context than residential or commercial development.

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

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11. Signature:	Besa Sadiku Sinani	Date:	23/06/2025
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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.

From:
To:
Subject:
Date:

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From: David and Emma Philips
Flat address: [REDACTED]
Telephone number: [REDACTED]
Email address: [REDACTED]
[REDACTED]

RE: CAMDEN LOCAL PLAN: OBJECTIONS TO SITE C27 (LAND EAST OF CONSTABLE HOUSE, ADELAIDE ROAD) BEING USED FOR GYPSY & TRAVELLER ACCOMMODATION

We are writing to you regarding the proposal to use site allocation C27 for Gypsy and Traveller accommodation.

We consider that this is not appropriate for the reasons set out below and as such Site C27 should be deleted from the following:

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

REASONS

1. Amenity space associated with housing estates

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

2. Local Green Space /Open Space

The area has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO

Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.

3. Playground

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

4. Overlooking

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

5. Flood Risk

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

6. Access

There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House due to the increase in persons using the accessway immediately opposite Eton Place.

7. School places

It does not appear that any consideration has been given to the availability of places at nearby schools.

8. Failure to follow guidelines

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

9. Inconsistency with Camden policies

The proposal is also inconsistent with other policies in the draft Camden Plan, including (inter alia) 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, and improved access to nature; to enhance greening and biodiversity; and to deliver flood mitigation measures and sustainable drainage systems.

10. Consultation

There has also been no consultation with local residents in relation to the proposed use of this site (as can be seen by the fact that most residents at Etons and Constable House are still unaware of the proposals).

CONCLUSION

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

Yours faithfully

David and Emma Philips

[REDACTED]
[REDACTED]

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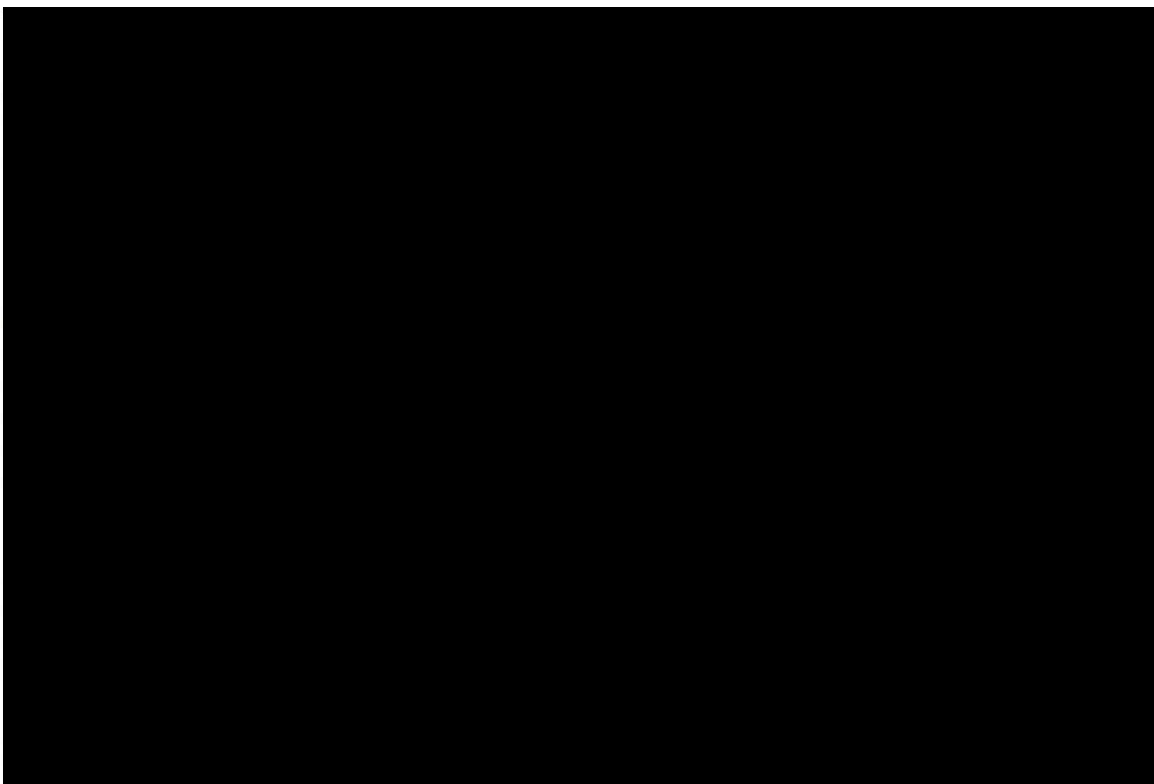
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Responder 136

Date: Tue, 24 Jun 2025 06:36:15 +0000
From: Angela Warden
To: planningpolicy@camden.gov.uk
Subject: Traveller/gipsy site Chalk Farm

Dear Sir/Madam



Yours faithfully
Angela Warden
[redacted address]
[redacted] postcode]

Sent from my iPad

From:
To:
Cc:
Subject:

Date:

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

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

PERSONAL DETAILS

Name: Kelly Souza

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **There is already a shortage of green space near Chalk Farm station.**
This area is used every day by both local residents and people working locally, as a cost-free leisure space. Builders socialize with each other after finishing their jobs and starting their commute home. Young children use the low wall as a "tightrope", adding a bit of joy to their walk to/from school. Teens meet each other before/after school and neighbors stop for a chat. In a dense urban location, this would critically reduce leisure amenities for local residents, both within Constable House and from the greater area.
- This area is a **Local Green Space /Open Space with mature trees and wildflowers**: There are dozens of mature holly trees which provide some green (and red berries!) in the winter and cool down the pavement in the summer. There are fruit trees and an area of wildflowers that have been cultivated through a collaboration between multiple local organisations and providing local young people with an age-appropriate sense of purpose and responsibility.

- **Playground:** the children living in Constable House depend on this area for vital outdoor play and socializing with their neighbours. It is unfair to take away this facility for so many children, without providing any viable substitute.
- **Overlooking:** The site is overlooked on all sides and bordered by the major through route of Adelaide Road, which includes a regular bus route. Constable House, Provost Road, the Etons, the new residential block next to the tube station and the buildings on other side of Adelaide Road together comprise hundreds, if not thousands, of residents.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also complicate the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

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

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

Conclusion

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

Given the implications on my family's well-being, as well as on hundreds of others in the local area, I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Kind regards,
Kelly Souza

Responder 138

Date: Tue, 24 Jun 2025 07:40:22 +0000
From: Mei Ling Routley
To: planningpolicy@camden.gov.uk
Subject: Proposed Traveller Site London NW3

I am writing on behalf of the residents of [redacted] [redacted postcode], in my capacity as Chair of our Residents' Association.

I understand that Camden Council has shortlisted the green space east of Constable House (Adelaide Road & Eton College Road, London NW3) as a permanent Traveller site.

This has raised concerns, based on what is known about the small site and the surrounding area, whether the space is adequate for your intentions.

[redacted]
[redacted]
[redacted]

Our overall view is that we object to the use of this site as a permanent Traveller site.

I would be grateful if you could record this objection in your consultation.

Thank you.

Yours Faithfully

Mei Ling Routley

[redacted]
[redacted]

Date: Tue, 24 Jun 2025 07:42:58 +0000
From: patricia lui
To: planningpolicy@camden.gov.uk
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road
(Gypsy And Traveller Site) Of Draft Local Plan.

Name: Patricia Lui

Address: [redacted address], [redacted] [redacted postcode]

Email address: [redacted email]

To: Camden Council Planning Policy Team

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

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

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

I therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process. I also support the representation by the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, [redacted postcode] - located directly opposite the proposed site - in their objection in the strongest possible terms to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

Responder 140

Date: Tue, 24 Jun 2025 07:44:39 +0000

From: Shelli Epstein

To: planningpolicy@camden.gov.uk

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

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

PERSONAL DETAILS

Name: Shelli Epstein

[REDACTED]

[REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- :
- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road

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

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


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

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

Conclusion

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

Responder 141

From: 
To: [PlanningPolicy](#)
Subject: Gypsy traveller site next to Chalk Farm station
Date: 24 June 2025 09:18:45

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

Dear sir

I have lived in the area for 40 years now. You have managed to turn what was a wonderful corner at Chalk Farm tube , to haverstock hill and Adelaide Road into a mess. To now want to put a traveller site here will bring an even bigger negative effect to the business & property in the area. Our hard earned money put into property years ago is going to deteriorate even more if you agree to this site for travellers. Plus the crime in the area is getting worse and to have this mobile site will bring a lot more transient people to the area. People that have not lived and cared for the area for years. The people that live here love the area and do not want it turned into a gypsy site along with the HS2 works in limbo. Please take some pride in our area and community and help us grow back to the way it was pre covid.

Kind regards

Claire Beecham

Sent from my iPhone



Responder 142

Date: Tue, 24 Jun 2025 09:24:11 +0100
From: Geoff Smith
To: planningpolicy@camden.gov.uk
Subject: Traveller Site Constable House (Adelaide Road/Eton College Road)

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Dear Camden Planning

I would like to object to the proposed Traveller site near Constable House.

This is a prime site within Chalk Farm/Primrose Hill and I cannot see how the site is in line with Camden's objective of improving Primrose Hill (eg proposed works to the high street, Regents Park Road) and making it a 'destination'. Having a permanent site of caravans, mobile homes and vans near Chalk Farm Tube, the primary route into Primrose Hill for visitors, will be unsightly and detract from the area, which is renowned for its period architecture and ambiance.

The site serves as a green lung in this densely populated area and, if anything, should be made into a managed green space for the benefit of local residents.

If it is not possible to make it into a managed green space, then at least it could be used for social housing, of which there is a severe lack in the area.

There surely must be alternative areas within the borough that are not such valuable prime residential sites that could be used for such a permanent site, at lower effective cost to council taxpayers. Creating a traveller site seems to be a poor use of such a valuable site.

Regards

Geoffrey Smith
[redacted address], [redacted postcode]

Responder 143

Date: Tue, 24 Jun 2025 09:21:05 +0100
From: Neil Roth
To: [redacted]
Subject: CAMDEN NEW LOCAL PLAN

[redacted] [redacted postcode]
[redacted]
[redacted]
[redacted]



REPRESENTATIONS ON DRAFT NEW CAMDEN LOCAL PLAN

Future Transport London (FTL) makes the following representations:

Under Infrastructure section O,

“....Key priorities for the Central section of the borough include:”

“3. The upgrade of the North London Line, to reinstate four tracks and deliver a third platform at Camden Road overground station from 2030, to meet future passenger and freight demand”

FTL wholeheartedly WELCOMES this “Key priority”. However, the next one reads

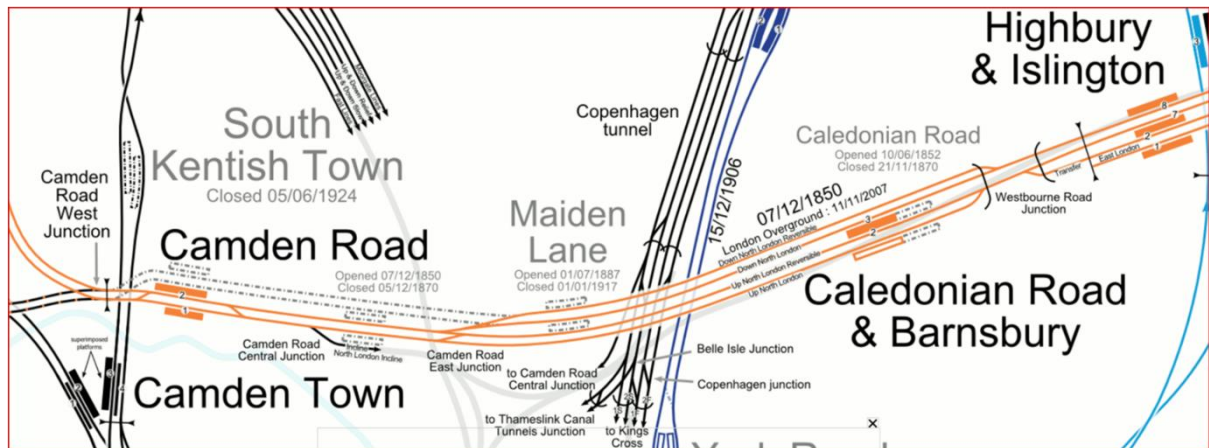
“4. The Camden Highline, an elevated walkway between Camden Town and King’s Cross”.

Paragraph 4 is TOTALLY INCOMPATIBLE with paragraph 3 as it would occupy a big chunk of the land required for the tracks and platform you are proposing to be reinstated from 2030!

Camden Highline, if fully implemented, would only be between Camden Road station and York Way (NOT “Camden Town and King’s Cross” as stated in your draft).

FTL believes that the Regent’s Canal towpath provides a far more attractive and direct walking route between Camden Lock and St Pancras than Highline ever could and we urge the Council to DELETE Camden Highline from the new Local Plan.

APPLICATION 2022/2019/P - “CAMDEN HIGHLINE”



(reproduced with permission)

We are the campaign group ‘**FUTURE TRANSPORT LONDON**’ and collaborators, and we wish to **OPPOSE** this planning application, in this joint submission.

2022/2019/P is contrary to national and London strategic planning policy and at odds with some Camden policies.

The application must be decided on its merits with no assumptions that there will ever be a further phase. There would have been an option for a ‘hybrid’ application, including the rest of the project in outline. That would regularise the status of much of the submitted planning documentation of 2022/2019/P provided by the applicant, which otherwise can never be democratically tested. The Planning Authority will need to explain what advice it has offered.

Instead of an outline application for the whole project, there is a full application for part of it. Permission should be refused on grounds of prematurity, otherwise the Authority would be acting unreasonably.

The Planning Authority will know that determination of planning applications is extensively covered in case law, including Wednesbury reasonableness and past cases on irrational decision-making.

Further, the unique selling proposition of this project - that the railway corridor involved is likely to be unwanted for a considerable period – is contradicted by published material that the applicant chooses not to include in its submitted documentation.

Absurdly, there is no material that covers the removal of the proposed infrastructure and its financing.

As submitted, this is not a credible ‘meanwhile’ project, but a permanent one.

Planning Officers must acknowledge that fact, and that consent would permanently undermine Network Rail’s published aspirations for the UK’s rail freight industry and Transport for London’s plans for increased London passenger railway capacity.

(1) THE PROJECT’S NAME

We think it is highly misleading to call this a ‘highline’, because it is dissimilar to all other known examples, whether proposed or actually opened.

For instance:

- The ***New York Highline*** is a converted freight-only elevated railway, permanently abandoned because of reductions in commercial demand and the use of road vehicles instead
- The ***Paris Highline*** (La Coulée Verte) is a permanently abandoned section of the Vincennes railway line, where passenger demand is now met by Metro lines and tracks diverted into the regional RER ‘Paris Crossrail’ service
- The proposed ***Birmingham Highline*** uses the Great Western Railway’s brick viaduct in Digbeth, built 165 years ago and never opened as a railway
- The soon-to-open ***Manchester Highline*** is on the unused Grade II-listed Great Central Railway’s Castlefield Viaduct. At one end of it, the main line station is now a conference centre. At the other end, Metrolink trams have taken over the track bed
- The proposed ***Peckham Coal-Line*** in south London uses the abandoned London & North-Western and Midland Railway’s coal sidings, to the east of Peckham Rye station.

Unlike all the others, the Camden proposal is on operational railway land.

Application documents refer to a 20-year period, perhaps extended to a 30-year period. Comments on BBC Radio 4 aspired to it being there “in perpetuity”. Indeed, return to railway use would not be straightforward, financially and perhaps politically.

(2) THE RAILWAY CORRIDOR INVOLVED

Some Londoners will remember four tracks in use on the east-west North London Line across Camden, when various main line trains were diverted to Camden Road station while Euston station was being rebuilt in the 1960s.

Many more people will remember three Camden tracks in use when freight trains avoided the passenger service platforms. Freight trains and some passenger trains to Watford Junction ran through Primrose Hill station, and that route is still an active diversionary route for London Overground.

Although freight trains are slow, modern passenger trains have such high acceleration that the two-tracks-only railway bridge over the A400 Kentish Town Road is no longer a realistic bottleneck:

Regeneris Consulting has produced for the scheme's applicant a document

Camden Highline Benefits Analysis, May 2018

renamed in the application as

Camden Highline Benefits - Final Report, May 2022

(so, there isn't a later one!)

Paragraph 2.12 of the document states:

“This [that is, the A400 railway bridge] would appear to reduce the operational benefit of reintroducing four tracks to the east of Camden Road Station.”

Regeneris do not offer any evidence they have the railway expertise to credibly make such a significant claim.

Planning Officers must either state they reject that assertion by Regeneris, or offer guidance to Committee Members on maximum train traffic levels and headways (distance or duration at specific line speeds) on this two-track railway's A400 Kentish Town Road bridge.

It is important that Officers comment to Members on the extensive documentation that has been submitted that goes beyond the actual application.

Officers must confirm that:

(a) under the Planning Acts, extensive documentation in an application to provide 'context' has its limits, because the proportion and extent must be 'reasonable', and

(b) there is confusion on whether there is an opportunity in consideration of 2022/2019/P for the Planning Authority to test all parts of submitted documentation, given it has not been tested under the Planning Acts already, and, at this rate, may never be tested.

Not to clarify the statutory process would breach the Aarhus Convention (the UK-ratified international treaty, the **United Nations Economic Commission for Europe's 'Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters'**).

In regard to point (a) above, will Officers agree they cannot reasonably give any impression that the whole of the project's route is being considered in 2022/2029/P, and that any further planning applications that might come forward could not rely in any way on the submitted 'context documentation' supposedly 'approved' in this application by Committee?

In planning terms, does the Authority believe that wider documentation cannot be considered under the Authority's statutory planning powers, in regard to locations outside the boundary of this application, at this stage?

If Officers disagree with that, they must say so and give precedent, or they will be acting unreasonably.

It is certain that further applications would be needed from the applicant, since their overall proposal goes far beyond Network Rail's deemed planning consent for operational railway land, available to it under the Town and Country Planning Act 1990 (as amended), Section 90.

In regard to point (b) above, Officers must point out to the Committee there has been no attempt by the applicant to offer the Planning Authority a 'hybrid' application; that is, one that seeks outline planning permission for the whole project and full planning permission for just one part of it.

Does the Planning Authority know why? Has the Authority suggested that? Are pre-application discussions with applicants published by the London Borough of Camden, as happens with other authorities?

Overall then, the documentation on parts of the project that lie beyond the boundary of the application has an ambiguous status – given the limited scope of 2022/2019/P

freely chosen by the applicant, at what stage is it to be tested under the Planning Acts?

The wider documentation nevertheless needs to be challenged, even though it is outside the scope of the application.

As a somewhat minor example, there seems no documented consideration (perhaps even by Network Rail) of future technical infrastructure sites to support additional traffic on the existing two-track railway.

New signalling cabinets need new areas of land for their construction before existing sites are taken out of service. More intensive freight and passenger services on existing tracks often need additional trackside power supply equipment, and locations to house them. Unlike increasingly miniaturised signalling cabinets, power supply structures invariably get bigger. Where are the agreed and documented passive provision sites for such infrastructure, including providing reasonable safe and efficient access?

(3) ATTITUDE OF NETWORK RAIL, THE RAIL FREIGHT INDUSTRY AND TRANSPORT FOR LONDON

The application's
Camden Highline Benefits - Final Report
(from 2018) states in Paragraph 2.10 that:

“Network Rail (the owner of the asset) have indicated their willingness to enter into an agreement to lease the available asset.”

The application's **Masterplan** document (dated May 2022) states that on page 12 that:

(a) ***“Network Rail, which currently own and maintain the viaduct structure, actively support the project and have undertaken businesses and technical clearance proving its feasibility.”*** and

(b) ***“Transport for London have confirmed that they have no need to reinstate the tracks for passenger capacity”.***

In regard to point (a) above, there is no claim in the application that Network Rail has given strategic clearance from

- Network Rail senior management, or
- the Department for Transport

to support the proposal.

What does “indicating a willingness” mean? Why is none of this interaction with Network Rail documented, so that it can be tested?

Does the project have ‘full clearance, subject to contract’, or has Network Rail so far merely considered it favourably because it would be an income-generating matter?

What level within Network Rail has been involved? What documentation has been produced? Why isn't it in the planning application?

‘Technical’ clearance is not the same as policy or strategic clearance.

In regard to point (b) above, the Transport for London

“no need to reinstate”

comment above is false, as evidenced by documentation that the applicant has chosen not to provide as part of this application.

In more detail:

(3a) Network Rail

Officers should make clear to the Committee what the policy is of Network Rail Strategic Network Planning. Its remit is to understand:

- how the railway contributes to national and regional economic growth and improvements in social well-being
- what the railway is capable of and how it delivers a service to passengers and freight users
- what the likely changes to demand, passenger needs and patterns of train service will be in the future

- what kind of changes to the railway as a whole we should make in future.

There is no indication in the application of sign-off by Network Rail Strategic Network Planning. This is a UK strategic route, including for freight to and from east coast and Thames estuary container ports. Freight on railways reduces freight on London's roads.

Planning Officers must decide, by investigation, if they consider the 2022/2019/P proposal to be compliant with detailed statutory obligations imposed on Network Rail by the Department of Transport:

- ***“pursuant to the Railways Act 1993 or any other enactment or any licence granted to the Company”, and***
- ***“to carry on the business of acquiring, owning, managing, providing, operating and developing railway network services and station services in all their aspects.” [Underlining added.]***

Officers must report to Members whether the claimed ***“willingness”*** quoted in the application is also compliant with the overall methodology of Network Rail's

‘Executive Guide to Consents for Infrastructure Projects’

since the proposal, though small scale, has strategic aspects of national significance that are normally dealt with in much larger projects. The guide explains that, for those larger projects:

“The Planning Act 2008 created the ‘Infrastructure Planning Commission’ (IPC) as the authorising body established to process ... nationally significant projects. This body was abolished in the Localism Act when its powers transferred through to the Planning Inspectorate. Responsibility for decisions on these projects rests with the relevant Secretary of State.”

The current version of the administrative document

‘Framework Agreement Between the Department for Transport and Network Rail’

points out that:

- ***“Network Rail with all of its subsidiaries is now classified by the Office for National Statistics as a central government body”, and***
- ***“the Secretary of State will ensure that Network Rail is guided and monitored in the public and taxpayer interest”, and***

- ***“the Secretary of State as customer sets the long-term strategic vision and develops the policy framework within which NR is required to operate”.***

Removal of future rail capacity across the London Borough of Camden is not ‘reasonable’ within the Network Rail parameters described. If Planning Officers disagree, they must provide Members with evidence on this matter.

(3b) Transport for London

The application’s

Camden Highline Benefits - Final Report

(from 2018 but still apparently current in 2022) states that the applicant:

“has received verbal confirmation from TfL that they do not have ambitions to reinstate the track to live use as a priority capacity improvement on the North London Line and are awaiting a final report”.

A verbal policy is not good enough. Furthermore, there is no specific update on that verbal level of agreement in the planning application.

However, regarding the text that has been underlined above, there is good news!

The definition of ***“final report”*** is unclear (needing lengthy business case studies to be “final” perhaps) but **there is NOW a “final” report, produced by Network Rail Strategic Network Planning.**

The new study (“the final report”?) is the

‘London Rail Freight Strategy’

which was published in May 2021 (so looking beyond the period of Covid).

The report has not been mentioned by the applicant in their application 2022/2019/P.

The summary report states that:

- “freight stakeholders identified the development of a London Rail Freight Strategy as a strategic planning priority.

“The London Assembly Transport Committee also recommended the development of a joint rail strategy for London with Network Rail and the

wider industry in its 2018 ‘Broken Rails’ report, a key component of which should be a freight workstream”, and

- “the London Rail Freight Strategy thus has dual roles, as both a study to produce strategic advice for the Government, within NR’s Long-Term Planning Process, and as a workstream forming part of the developing NR and TfL Rail Strategy for London”, and

- “Network Rail intends to seek funding to deliver core elements of this strategy through the Department for Transport’s Rail Network Enhancements Pipeline [which is...] a new approach for rail proposals that require government funding.

“This approach creates a rolling programme of investment, focused on outcomes that provide benefits for passengers, freight users and the economy, and moving government investment in enhancements away from a rigid 5-year cycle”, and

- “the development of this strategy and the identification of options for funders has been informed by capacity analysis, focused on the London orbital routes” [Underlining added], and

- quoting further from the Network Rail report, the first intervention mentioned in it (so maybe the highest aspiration, and therefore hardly 30 years away!) is:

“CAMDEN ROAD PLATFORM 3

“Reinstatement of a third track and platform on the northern side of Camden Road station, utilising part of the former 4-track formation through the station.

“This proposal would reinstate a third track and platform on the northern side of Camden Road station, utilising part of the former 4-track formation through the station.

“The additional capacity provided would facilitate much greater flexibility in pathing options for trains on this busy central section of the North London Line, opening up new options for future service provision and bolstering performance resilience.

“Reinstatement of a third platform would enable platform 2 to be used as a central turnback, with [the still existing, but unused] platform 3 becoming the eastbound line for through London Overground services and the majority of freight.

“Transport for London modelling suggests that the eastern end of the North London Line, from Canonbury to Stratford, will see some of the strongest long-term demand growth on the Overground network.

“A turnback platform will allow this to be addressed with peak-capacity-boosting Stratford-Camden Road services and there would also be the option to operate these through the off-peak. [This would] offer a means of providing additional passenger capacity where it is most needed.

“The availability of an additional platform would also aid performance recovery during perturbation on the orbital routes”.

This Network Rail strategic report is not mentioned in the application. Why not? Does the Planning Authority need to insist that it is?

How will Officers address this crucial matter, and represent it to Committee Members?

Given the publication of that Network Rail strategic report, further comment needs to be made regarding

Camden Highline Benefits - Final Report

since Paragraph 4.12 states that:

“to bring the disused lines between Camden Road Station and York Way back into operational rail use would require substantial reinforcement works to the bridge structures along the route that have fallen into disrepair over time”.

That is indeed so. It is typical of any rail development project. That’s what they do.

As another example, this Network Rail / rail freight industry / Transport for London report that has been ignored by the applicant has a second, similar case of intended investment which is worth quoting in detail:

“CLAPHAM JUNCTION PLATFORM 0

“The longstanding proposal for the creation of additional bay platform capacity at the northern end of Clapham Junction station, for the use of London Overground West London Line services, is supported by this strategy.

“The scheme would reinstate the disused former platform 1 to create a newly-designated ‘Platform 0’, adjacent to the present platforms 1 and 2. This intervention has been recognised as key to long-term growth on the West London Line by several previous pieces of work for both Network Rail and Transport for London, which have consistently concluded that additional platform capacity at Clapham Junction is needed, if TfL’s aspiration to increase the West London Line Overground service to six trains per hour is to be met.

“Capacity analysis for the London Rail Freight Strategy has reaffirmed that the desire to operate this level of service throughout the day cannot be achieved with a single bay platform.

“Although this scheme would clearly be of direct benefit to the London Overground passenger service, the positive impact it would have on the capacity and performance of the West London Line overall means that it is also very much in the interest of freight that Platform 0 be delivered.

“Without a new bay platform, the main alternative means to increase Overground train frequencies involves the use of platform 17 at the far [southern] end of the station, where freight and Govia Thameslink Railway trains pass through towards the Brighton Main Line. This is a sub-optimal solution for both freight and passenger operations.”

That lengthy quote is justified because it describes an equally rusting viaduct structure as the one in Camden. It describes a rail industry scheme of similar complexity and cost to the one in Camden. And it is likely to proceed in a similar timeframe to the one in Camden, and certainly not 20 or 30 years in the future.

The London Rail Freight Strategy will be developed in an unknown future economic climate of course, but it aspires to have all its projects completed by the 2040s.

With a centuries-old history of continual railway investment as freight markets and passenger numbers change (and usually increase) some of the aspirations will doubtless proceed earlier, some later. The climate change commitment of the government now in statute can only accelerate that investment, particularly when involving modal shift.

The Camden track reinstatement will need to progress through established railway processes. There are many unknowns:

- how quickly DP World’s new London Gateway container port in Essex increases North London Line rail freight traffic demand to and from the West Coast Main Line (the Euston line)

- how quickly overcrowding on London Overground trains to, and through, Camden Road station becomes unacceptable
- what opportunities there are for modal shift of freight and car travel from London's roads, including the enlargement of the Ultra-Low Emission Zone to outer London, and the likelihood of the introduction of road pricing

And so on.

Choosing to deliberately stop dead the possibility of a Camden North London Line railway scheme for 20 or even 30 years is unacceptable. It would be an unreasonable use of the statutory Planning Acts by the London Borough of Camden. Any unacceptable encouragement by Network Rail staff of the applicant's plans must also be withdrawn.

That is not to say that alternatives, such as refurbishing parts of Camden Road station and nearby green space at ground level are not great ideas.

However, interfering with operational railway land on the viaduct above is unacceptable, given how many years the applicant apparently requires it. Virtually everything at that level would have to be undone; it is also not transparent exactly how all that would be paid for.

(4) VIABILITY AND RISKS

The application's **Masterplan** document (dated May 2022) states that on page 12 that:

"The Camden Highline was included in Sadiq Khan's 2021 manifesto for London, and Camden's Labour Group manifesto."

Officers will need to explain if or how either of those facts legitimately influences them and their recommendation to Committee, under the Planning Acts.

The **Masterplan** continues:

"Network Rail, which currently own and maintain the viaduct structure, actively support the project and have undertaken businesses and technical clearance proving its feasibility. Transport for London have

confirmed that they have no need to reinstate the tracks for passenger capacity.”

Both of those misleading claims, directly copy-and-pasted from the **Camden Highline Benefits - Final Report** of 2018, have been criticised above, the first by queries, the second by condemnation. Furthermore, why is there no crucial documentation from the original sources in the application?

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Where is there a complete description of the freehold ownership of the land within the application boundary?

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The submitted document from Lichfields

Planning Statement – Phase 1

is described as having a purpose to:

“set the proposals in context and then appraise the proposal against prevailing planning policy and other material considerations” and

“considers the acceptability of the proposed development against the National Planning Policy Framework, the statutory development plan and other material considerations.”

It also states that:

“the application proposal accords with the Statutory Development Plan [both the 2021 London Plan and the 2017 Camden Plan] and should therefore be granted planning permission without delay. There are no other material considerations which indicate otherwise.”

Oh, yes there are!

Lichfields have clearly not searched for any other ‘material considerations’, so they have not found any:

- The fact there is no credible evidence to claim this is merely a ‘meanwhile’ project is ignored. Officers must surely consider that is a material consideration, or state why not.

- The fact that Network Rail Strategic Network Planning has published a recent report that is completely at odds with the claims (of permitted

meanwhile use for 20-30 years) is ignored. Officers must surely consider that is a material consideration, or state why not.

The Planning Statement also states that:

“This Planning Statement assesses the proposed development in the context of relevant national and local planning policy. This Statement should be read alongside the various other reports which accompany the planning application.”

Indeed it should. Many of the documents would be identical if an outline application were to be submitted for the whole project. So why hasn't a hybrid application been submitted? What did Officers state and note down on that subject at the pre-application meetings? Is that information published, as with other planning authorities (such as the Mayor's development corporations)?

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The Planning Authority's

Statement of Community Involvement

of 2016 points out in Paragraph 2.23:

“The Localism Act 2011 places a ‘duty to co-operate’ on local planning authorities and neighbouring boroughs for any cross-boundary issues. There is also a requirement for the local authority to co-operate with various public bodies for any cross-boundary issues. These bodies play a key role in delivering local aspirations and cooperation between them and local planning authorities is vital in order to make planning policies as effective as possible on strategic cross-boundary matters. The duty is to co-operate, not to agree.”

Under the responsibilities of the Localism Act, has the Authority presented the choice to neighbouring authorities and the Greater London Authority, between:

- the benefits of this (effectively permanent) project, and
- potential road traffic reductions in those neighbouring authorities and across London, of freight and car traffic via modal shift, based on the Network Rail, rail freight industry and Transport for London aspirations in the published report from Network Rail Strategic Network Planning?

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Can the Planning Authority confirm that it considers it reasonable, regarding this transport project involving UK rail freight strategy and London passenger services, that a consultee should also be the Department for Transport? If not, why not?

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Since the Office of Rail and Road (a) produces statistics of rail usage and (b) is the competition authority for the private-sector rail freight industry, does the Planning Authority agree it should also be a consultee, to ensure rail freight traffic through Camden Road station is not unacceptably constrained from private-sector competition for the next 20 to 30 years?

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Will the Planning Authority demand documentation on the removal of this project's 'meanwhile' infrastructure, both physical details and financial arrangements, before progressing this application (and does that include the whole route)?

Does it share a disbelief that successful fund-raising in the community for its removal is possible in 20- or 30-years' time?

What financial alternatives would be acceptable to the Authority, in a modified business plan? Ought there to be an enforceable sinking fund, independently administered? How would payment failures be policed?

Who would be financially responsible for removal, if the project's controlling entity became insolvent and was dissolved at an unexpected time within the next 20 or 30 years?

What contingent liability for future costs would the state, including the London Borough of Camden, need to take on, potentially continuously for the next 20 or 30 years?

Contingent liability is a potential liability that may or may not occur, depending on the result of an uncertain future event. The relevance of a contingent liability depends on the probability of the contingency becoming an actual liability, its timing, and the accuracy with which the amount associated with it can be estimated.

Would contingent liability be reflected in the annual accounts of the London Borough of Camden? Would Camden refuse to take on any such liability and seek to transfer it to other state bodies? Would Camden require acceptance of the latter before progressing the project?

Does the London Borough of Camden consider that there is too much optimism bias in the 2022/2019/P application documentation, and an unacceptably low quantity of risk analysis? Are Finance Officers prepared to sign off, in a separate published document, their views on that matter, to be quoted by Planning Officers, and that financial conclusions in the application contain sufficient sensitivity analysis?

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Does the London Borough of Camden consider the 'visitor numbers' and the 'transport usage figures' of the project (apparently predicted to be less and less by locals, and more and more by tourists, as time goes by) to be credible, and with sufficient sensitivity analysis?

What data has been provided to the Authority regarding, for instance, conclusions in the

Camden Highline Benefits - Final Report

and the

Camden Highline Business Plan

on financial and usage numbers, to allow independent analysis, including sensitivity and possible optimism bias? Will the Authority insist on such data publication?

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Why is there no reference at all in the two supplied

Transport Statements

(or anywhere else in the 2022/2019/P documentation) to the Network Rail, rail freight industry and Transport for London aspirations in the published report from Network Rail Strategic Network Planning?

Given the claimed 20 to 30-year duration of the project, does the London Borough of Camden consider it essential that a quantitative comparison must be made by the applicant, comparing:

- transport benefits of the scheme, with
- transport benefits of the aspirations in the published report from Network Rail Strategic Network Planning (that is, realistic extra freight carriage tonnage, increased rail passenger numbers to/from/through Camden Road station, and reduced use of London roads due to modal shift)?

And if not, why not?

(5) PUBLIC POLICY

On any reasonable interpretation, all the above material makes 2022/2019/P non-compliant with the National Planning Policy Framework and climate change policies of the government.

The London Plan requires a rebalancing of the transport system towards walking, cycling and public transport. It says nothing about promoting a deliberate reduction in railway capacity in London, to be replaced by walking. Do Officers wish to argue otherwise?

The same argument applies to the Camden Plan.

Camden's Planning Guidance on Transport cannot credibly be supportive of removing opportunity for increased railway capacity for UK rail freight and for London's wider rail passenger network. It would not produce conformity with the Camden Plan's Policy T3: Transport Infrastructure.

In fact, Policy T3 states exactly the opposite of the position of the applicant:

“The Council will seek improvements to transport infrastructure in the borough.


We will:

(a) Not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and

(b) Protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.”

Officers need to implement currently-adopted Camden Plan policy, and recommend rejection of application 2022/2019/P.

(end of objection)

From: 
To: [PlanningPolicy](#)
Subject: Camden Local Plan: OBJECTION to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 24 June 2025 09:25:13

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PERSONAL DETAILS

Name: Scott Harris

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

Reason for OBJECTION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves

as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Traffic and Road Safety** – This is already an extremely busy route and will cause traffic and road safety issues to local residents
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

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

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

Conclusion

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

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

Kind regards

Scott



Date: Tue, 24 Jun 2025 09:27:59 +0000
From: Arnold Berner
To: planningpolicy@camden.gov.uk
Subject: Representation on Draft Local Plan – Policy H11 Allocation for site C27:
Land Adjacent to Constable House, Adelaide Road

Email: [redacted email]

Date: 23/06/2025

Formal Representation on the Allocation of Site C27 Adjacent to Constable House under Policy H11

This submission outlines objections to the proposed allocation of land adjacent to Constable House, Adelaide Road, for use as a Gypsy and Traveller site under Policy H11 of Camden Council's Draft Local Plan. This representation raises procedural, environmental, technical, and legal concerns, which render the allocation unsound, unjustified, and procedurally deficient under the National Planning Policy Framework (NPPF).

I. Summary of Objections

1. **Tree and Biodiversity Impacts:** The site contains mature trees and supports significant biodiversity, both of which are inadequately considered in the plan.
 2. **Flood Risk and Surface Water Management:** Allocation lacks essential flood risk assessments, despite the site's known vulnerability to surface water and sewer flooding.
 3. **Community Engagement Deficiencies:** Local residents were not meaningfully consulted, undermining compliance with the Statement of Community Involvement and NPPF requirements.
 4. **Failure to Meet Identified Need:** The two allocated sites fail to meet Camden's assessed pitch requirement and are under delivering on Traveller provision.
 5. **Overlooking and Harm to Privacy - Amenity Impact:** The site is directly overlooked by tall multi storey blocks on two fronts.
 6. **Environmental & Heritage Considerations:** Potential conflicts with archaeological policies are unaddressed.
 7. **Parking & Highway Safety:** Increased demand for parking and vehicular access risks compromising highway safety and emergency access.
 8. **Premature Allocation Without Feasibility:** Allocation proceeds without resolved feasibility or infrastructure readiness, contradicting soundness criteria.
 9. **Cumulative Impacts:** The draft plan fails to account for combined pressures from nearby Traveller site allocations and existing developments.
-

II. Site-Specific Concerns

1. Tree and Biodiversity Impacts

The land adjacent to Constable House contains several mature trees and established vegetation visible from Adelaide Road and Eton College Road. These trees contribute significantly to the local character, air quality, and biodiversity in a highly dense urban area. In addition, the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi Trees planting. It would also involve the removal of substantial numbers of mature holly trees between 30 and 60 depending on the exact site.

- Camden's **Policy CC1** (Climate Change Mitigation), **Policy CC2** (Adapting to Climate Change), London Plan (**Policy G7: Trees and Woodlands**) and national biodiversity objectives emphasize protecting green infrastructure, yet no arboricultural or ecological assessments have been conducted to quantify the impacts of this development.
- Removal of this green infrastructure would harm local biodiversity and visual amenity, directly contravening Camden's own Local Plan policies.

Objection: *The allocation does not provide sufficient evidence to demonstrate that mature trees and biodiversity would be preserved or mitigated in line with local and national policies and other green infrastructure protections.*

2. Flood Risk and Surface Water Management

The site is located within a Local Flood Risk Zone, with a history of sewer surcharge and surface water flooding, particularly during heavy rainfall events. Camden's Strategic Flood Risk Assessment identifies this area as vulnerable.

- The Draft Plan lacks a site specific Flood Risk Assessment (FRA), Sequential Test, or Exception Test, as required by NPPF guidelines and **Policy CC11**.
- The plan provides no evidence of how safe access/egress would be maintained during flooding events.

Objection: *Without adequate flood risk assessments and mitigation measures, the allocation is unsound and breaches national and local flood management policies.*

3. Community Engagement Deficiencies

Residents at the Etons buildings, facing the site, as well as those of Constable House, directly adjacent to the site, report that they were not engaged in any consultations regarding the allocation prior to the Draft Plan's publication. This lack of engagement contravenes:

- Camden's **Statement of Community Involvement**, which requires meaningful, early stage dialogue with affected residents;
- NPPF Paragraph 25, which emphasizes transparent and inclusive planning processes.

Objection: *The allocation process for this site is procedurally deficient and undermines local confidence in the planning process.*

4. Failure to Meet Identified Traveller Need

Camden's Traveller Needs Assessment identifies a requirement for 16 pitches, yet the two proposed allocations (including Constable House) provide only six at most.

- No evidence has been provided demonstrating attempts to source additional sites through the Duty to Cooperate or other mechanisms.
- Alternative, more suitable sites have been excluded from the plan without transparent justification.

Objection: *The allocation does not meet identified needs and lacks justification for rejecting alternative sites.*

5. Overlooking and Harm to Privacy - Amenity Impact

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

This contravenes:

Camden Planning Guidance on Amenity;

PPTS (2023), para. 13(c);

Article 8 of the ECHR.

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

6. Environmental & Heritage Considerations

As the site lies within an Archaeological Priority Area, disturbances may conflict with local and national policies.

- No evidence shows that any archaeological or heritage assessment has been conducted.
- Potential disturbances to heritage assets remain unquantified and unmitigated, contrary to Camden's policies on heritage and conservation.

Objection: *Disturbance could irreparably harm historical assets, and policy requires written assessment prior to allocation.*

7. Parking & Highway Safety

The site's introduction of caravans and service vehicles may significantly increase parking demand on an already congested Adelaide Road.

- No transport assessment has been provided, and increased kerbside parking risks emergency vehicle access, cycleway usage, and overall highway safety.

Objection: *The lack of transport and parking impact analysis undermines the allocation's compliance with policies promoting highway safety and sustainable transport.*

8. Premature Allocation Without Feasibility

Camden's Site Selection Topic Paper acknowledges that additional design and feasibility work is required for the proposed Traveller sites, including Constable House.

- Proceeding with allocation without confirming deliverability or infrastructure readiness undermines the soundness of the Local Plan.
- The Plan provides no details on how utilities, waste management, parking, or site maintenance will be managed sustainably.

Objection: *Allocating a site with unresolved feasibility gaps violates NPPF soundness tests.*

9. Cumulative Impacts

The proposed allocation adds to boroughwide pressures on services such as waste management, healthcare, and education. Camden Council has failed to provide a comprehensive assessment of these cumulative impacts, as required under the soundness tests of the NPPF.

Objection: *Failure to assess cumulative impacts renders the plan ineffective and non compliant with NPPF requirements.*

III. Requested Action

Remove the land adjacent to Constable House (C27) from Plan Allocation and Policy H11

IV. Request for Participation

I would like to request to participate in hearings to address this representation;

Thank you for considering this representation. I look forward to your response.

Yours faithfully,
Arnold Berner

Responder 146

Date: Tue, 24 Jun 2025 10:30:58 +0100
From: Lorna Fowler
To: [redacted]
Subject: Local plan- proposed gypsy site

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

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

I cannot manage to fill in the formal comment form online so am commenting by email

To all those concerned:-

I can only assume that forced to nominate an area in their local plan to accommodate gypsies, Camden has nominated this small, scarce green patch, in this very crowded area, knowing it was unlikely to be suitable use for that purpose. There is no logic otherwise in nominating this site, which removes another rare green spot for community use. Plans propose even more building at Chalk Farm, including student housing and other much needed housing. Camden is already overcrowded so that Chalk Farm and Camden tube become one way only over parts of the weekend. It is a site close to Haverstock School which imports more people at the start and end of school days. Throw in The Roundhouse and the Lock Market and the night time pubs and clubs currently being encouraged by the Council, and it is hardly a place for gypsies in mobile or static caravans to live. Given the prejudices faced by those who adopt this alternative lifestyle, whether true Romany or Travellers, I would not choose to live on a small site, among crowds and buildings, the very opposite of the traditional camp sites gypsies choose. Given their love of dogs and their often owning horses, it seems both unsuitable for them and undesirable for local residents, who lose yet more green space: this is no one off, but in addition to other green spaces built on by the council, or permitted by the council, or on appeal, for others to build over. It is also very close to HS2, causing its own disruption for years yet. I foresee trouble and it is unlikely the overstretched police could cope with that. The nature of wishing to live a non-traditional lifestyle sometimes carries over into gypsies and travellers being a law unto themselves and makes clashes more likely. I formerly lived in Preston where an unsuitable site led to unbelievable trouble and taxed a then far more well -staffed police force. Gypsies need a safe site, less centrally located, not surrounded by residential areas, nor in already overcrowded areas where the numbers can now already be unmanageable. Chalk Farm is getting more much needed house building. It therefore needs every inch of green space. For the many reasons cited this plot is no place to give gypsies a suitable home.

Lorna Fowler
[redacted address]
[redacted postcode]

Sent from my iPhone

Responder 147

Date: Tue, 24 Jun 2025 10:41:42 +0100
From: Francesca Corbara
To: [redacted]
Subject: Traveller site - objection!

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

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Dear Sir or Madam

I'm a long time resident of Camden. I've lived in Hampstead, [redacted]
[redacted]

I strongly object to the new traveller site near Chalk Farm as it makes no sense to sacrifice a small green area for this project. My children and I walk to Chalk Farm to get the tube to go to school and there have been so many changes and disruptions on this road with the HS2 base, recladding of Blashford and the demolition and constructions near the tube station. The green area at the centre of this proposal is used by local kids and its a precious green lung on an otherwise busy and trafficked road. It needs to stay the same and not be demolished for more housing!! Travellers' houses or otherwise!

Kind regards
Francesca Corbara

From:
To:
Subject:
Date:

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

Dear Camden Council Planning Policy Team,

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

I, submit this representation — [REDACTED], located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

Best regards,
Qiao (Sylvia) Li

[Privacy Notice.](#)

From: 
To: [PlanningPolicy](#)
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 24 June 2025 11:05:14

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PERSONAL DETAILS

Name: Jasmine Shah

Address: [REDACTED]

Telephone number: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers**: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the

removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .

- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

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

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

Conclusion

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

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

Kind Regards,
Jasmine Shah



To: Camden Council Planning Policy Team

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

We submit this representation on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, NW3 2BU — located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

Kind Regards,
Jasmine Shah

Responder 150

Date: Tue, 24 Jun 2025 13:10:37 +0300

From: Margarita

To: [redacted]

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

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

To: Camden Council Planning Policy Team
**Subject: Camden Local Plan: objections to site
C27 - Land East of Constable House, Adelaide
Road (Gypsy & Traveler site)**

Margarita Florentiades
[redacted address], [redacted postcode]

[\[redacted email\]](#)

Dear sir/madam

I am the owner of the flat [redacted address],
[redacted postcode] [redacted]

I would like to express my strong objection to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveler accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

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

Moreover, the site is a long-established, well-used informal green space and is currently managed as part of the "Communi-trees" community greening initiative and 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.

Additionally, the site is directly and heavily overlooked from windows and balconies of neighboring flats, as well as from Eton Place, creating conditions unacceptable for both current residents and future site occupants.

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

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveler 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 Traveler site cases.

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. Traveler 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:

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- PPTS Paragraph 13(g) - sites must not be at high risk of flooding;
- Precedent: APP/B5480/A/11/2151483 (Romford) - Traveler sites refused on similar flood vulnerability grounds.

In addition, AECOM's methodology for the Gypsy and Traveler Site Identification Study (GTSIS) clearly applied filters that would exclude sites within 18m of 4+ storey buildings (overlooking), used as play space, risk of surface flooding and without safe vehicular access.

Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage.

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

Thanking you in advance
Margarita Florentiades

Responder 151

From: 
To: [PlanningPolicy](#)
Subject: FW: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 11:12:10

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

To: Camden Council Planning Policy Team

From: Omair Makhdumi, 


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

I submit this representation to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

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conflict with:

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

Responder 152

Date: Tue, 24 Jun 2025 11:26:37 +0100

From: William C Stein

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

Subject: Local Plan [redacted address] Recycling Centre Relocation proposals

I write to make representation to the Camden Local Plan 2025, particularly the proposed relocation of the Regis Road Recycling Centre to the Police Station site on Holmes Road.

The Local Plan's suggestion to relocate the recycling centre is in abject opposition to Camden's aspirations to deliver high quality homes, support economic development including attracting new investment to Kentish Town, and improve the character of Kentish Town commercial centre.

The proposed new location is also immediately adjacent to one school and close to another. The obvious noise pollution, air pollution, heavy traffic disturbance as well as nuisance smells of a recycling centre on Holmes Road poses serious risks to public health and safety in the area, and is in direct opposition to Camden's own Healthy School Street programme among other initiatives and policies.

Overall, I am very supportive of the lofty aspirations of the Draft Regis Road Area Framework and the Camden Film Quarter. However, the proposed relocation of the recycling centre to Holmes Roads lacks the required care and thoughtfulness I would have expected from Camden's highly regarded planning policy team.

Improving areas around schools and the journey to and from schools is not at odds with growth or development, but policy proposals such as this proposed unimaginative and poorly considered relocation creates the unfortunate dynamic of putting housing and development, which is welcome in this area, against the health of our youngest and most important residents, the children of Camden. There has to be another way.

Be well,

William Stein

Camden Resident

[redacted address]

[redacted postcode]

Responder 153

Date: Tue, 24 Jun 2025 11:27:07 +0100
From: susan mcneill
To: [redacted]
Subject: Proposed new recycling site

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Most people in the area/street have only just heard of this and Understand the deadline is Friday. Even the school St Patrick's has just this morning been informed by a parent when the recycling place will be almost opposite. Even though the entrance may not be on Holmes Road it will create a nuisance. Why have it near homes? There must some other part of Regis Road that is not near residential properties.
Thank you
Susan Mcneill

Date: Tue, 24 Jun 2025 10:27:22 +0000

From: zulakha mughal

To: planningpolicy@camden.gov.uk, planning@camden.gov.uk, Patricia Callaghan (Councillor), Rebecca Filer (Cllr)

Subject: Objection to the Proposed Allocation of Play Area for Gypsy and Traveller Site at Counstable House before 27th June 2025

Dear Sir/Madam,

I am writing to formally object to the proposal to allocate the play area adjacent to Constable House for use as a Gypsy and Traveller site. As a resident of [redacted address] London [redacted postcode], I believe this proposal would cause significant harm to the community, environment, and infrastructure of the area.

The play area currently serves as a vital public space for local children, families, and residents, and its removal would have far-reaching consequences for the wellbeing, safety, and cohesion of the neighbourhood.

My objections are as follows:

1. Loss of a Vital Public Amenity:

The play area is the only accessible outdoor space for children and families in the area. Its removal would deprive local families of an essential facility for outdoor recreation, social interaction, and child development.

2. Loss of Vital Green Infrastructure:

The play area contributes to the area's green infrastructure, providing environmental benefits and enhancing the quality of life for local residents. The removal of this space would violate Camden's Local Plan policies designed to protect open spaces and ecological assets.

3. Environmental and Structural Safety Risks:

The proposed site is known to have ground instability and water table issues, with previous structural problems at Constable House. The land is not suitable for further development, particularly for residential use, as it poses significant safety risks to both people and existing buildings.

4. Increased Traffic and Strain on Infrastructure:

The area is already dealing with significant congestion, especially with the ongoing development near Chalk Farm Station. The addition of a Gypsy and Traveller site would exacerbate traffic issues, negatively affecting pedestrian safety and emergency access.

5. Loss of Community Cohesion and Safety:

There are existing concerns regarding safety and security in the area, as evidenced by reports to the police. The introduction of an itinerant community would likely increase these challenges and disrupt the peaceful, cohesive environment that local residents currently enjoy.

6. Lack of Adequate Community Consultation:

The notice on the pole does not meet the Council's legal obligation to properly inform and consult with local residents. I am concerned that the community has not been given a fair opportunity to engage with the decision-making process.

7. Adverse Impact on Residential Amenity and Property Values:

The introduction of a Gypsy and Traveller site in this location would alter the character of the area, leading to a decline in the quality of life for residents and a potential decrease in property values, which could negatively impact those who have invested in homes in this community.

Given these concerns, I respectfully urge Camden Council to reconsider the proposal and retain the play area for its intended use. Alternatively, I ask that the Council explore other sites for this purpose that do not negatively impact the surrounding residential area or its infrastructure.

I trust that you will carefully consider my objections and respond appropriately. Thank you for your attention to this matter.

Yours sincerely,
Mrs Z. Mughal (Cindy)

[Redacted signature]

[Redacted address line 1]

[Redacted address line 2]

Responder 155

From: 
To: 
Cc: 
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 11:33:10
Attachments: [imagecdadcf.png](#)

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To: Camden Council Planning Policy Team

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

We submit this representation on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, NW3 2BU — located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).



Iftikhar Ali



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1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) – sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);
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- Precedent: APP/B5480/A/11/2151483 (Romford) – Traveller sites refused on similar

flood vulnerability grounds.

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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Conclusion and Requested Action

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

We therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and Inspectorate revisit alternative, more

appropriate sites through a transparent, community-informed process.

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From: 
To: [PlanningPolicy](#)
Subject: Re: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 11:33:56

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Best, Divya Narayan



Responder 157

Date: Tue, 24 Jun 2025 10:42:43 +0000
From: Laurence Page
To: planningpolicy@camden.gov.uk
Subject: Draft Local Plan Consultation Response

Constable House – representations

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

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

Please send your representations by email to planningpolicy@camden.gov.uk

Possible text:

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

PERSONAL DETAILS

Name: Laurence Page

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed – Exclude from the Local Plan “Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation”

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Need for accommodation not established:** Camden’s underlying policy was last prepared in 2014 and not updated. The more recent GLA policy is provisional only. The Local Plan should be based on finally established needs, not provisional findings.
- **Failure to gather evidence:** There has been no consultation with residents in Constable House (who would lose access to their playground and local green space should the area be approved/planning permission ultimately granted); there has been no consultation with residents of Eton College Road (who would face increased traffic); and there has been no consultation with local schools to identify whether they have or are likely to have places for the additional pupils.
- **The proposed site is not appropriate:**

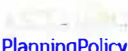
- **The proposed site is not previously developed (brownfield), untidy or derelict land:** The site comprises a play area/playground for residents at Constable House and a green space around the Constable House curtilage. Whilst the play area is in a poor state of repair, Camden is responsible for this state of neglect. It should be renovated, not repurposed. The green space has been planted and is looked after by the Koko Foundation; it contains mature trees and wild flowers.
- **Flood Risk:** The site lies within a flood risk zone. It has suffered significant flooding across the play area in 2023 and 2024. The approval of a site at this location is contrary to para 13(g) Government Traveller Sites Planning Policy.
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Amenity space associated with housing estates.** The playground and the green space form the key amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location. The closest alternative playground is over 10 minutes walk away, at the far end of Primrose Hill.
- Any proposed development would diminish “opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children”. This is contrary to paragraph 27(c) of the TSPP.
- **Noise/air quality:** the site is adjacent to Adelaide Road, which is a major thoroughfare. It will be negatively affected by that noise, and will in turn materially increase the noise for Constable House, because (i) the residents will have lost the protection currently created by the trees etc on Adelaide Road; and (ii) the residents will themselves create additional noise.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- **Inconsistent with other aims in the Local Plan:** Chapter C1, paragraphs 16, 17 and 22 of the draft plan seek, amongst other policies, to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of public open space and play space, and improved access to

nature; (iii) to enhance “greening and biodiversity”; and (iv) to deliver flood mitigation measures and sustainable drainage scheme. These policies will be undermined, rather than promoted if the designation of site C27 is changed.

Conclusion


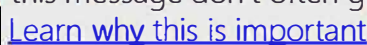
For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

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

From: 
To: [PlanningPolicy](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 11:47:40
Attachments: [20x20-5723907427989361648.png](#)
[20x20-11283250780356857967.png](#)
[20x20-16124440275027828245.png](#)

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Kind Regards,

Stacey Blakey

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Responder 159

From: 
To: [PlanningPolicy](#)
Subject: Fw: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 11:51:37

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

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing

multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM’s methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly

applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access. Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

Kind regards

Vamsi Kamineni



Responder 160

From: 
To: [PlanningPolicy](#)
Subject: Camden Local Plan Review Call for
Date: Sites 24 June 2025 11:58:06

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

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

To whom it may concern,

I am writing to you in relation to the proposed Sites for Gypsies and Travellers by Chalk Farm station.

As a member of the community the proposal is quite frankly, ludicrous. In the words of the planning commission and as a direct lift from the "Assessing needs" paragraph in the proposal, "The Accommodation Assessment concluded that there was no evidence of major travelling routes through Camden that would generate any need for a transit site and that there is no evident need for additional plots for travelling show people." This statement says it all.

Any sort of fair or show would require approval from the council and in the past 25 years my family and I have never once seen such event take place in Camden. The problem is homelessness and the countless number of people already setting up tents and other forms of temporary shelter around both Chalk Farm and Swiss Cottage tube stations. This issue is already rampant across the area and there have been countless incidents where rubbish, dirty blankets and other forms of bedding are left behind. Families do not feel safe, and this does not lead to a better, family friendly community. It is in the title itself - "traveller". Such "travellers" will not provide any economic benefit to the community as they are passing through by nature of their lifestyle.

In addition to the homelessness problem this will further add to the issue where this type of temporary accommodation will be abused and overrun. Who is paying for this? Council tax payers. It is simply a WASTE of council fees which are going up year on year. To reiterate, this will NOT benefit the residents of Chalk Farm and would be a nuisance.

I plead with you to consider what is best for the community, not for temporary visitors. Afterall, we are the ones footing the bill.

Alina Lui

Date: Tue, 24 Jun 2025 12:58:49 +0200
From: Maggiel Scalongne
To: [redacted]
Subject: Fwd: Site allocation C27-Land East of Constable House

Début du message transféré :

De: Maggiel Scalongne <[redacted email]>

Date: 24 juin 2025 à 08:52:58 UTC+2

À: [redacted email], [redacted email], [redacted email]

Objet: Site allocation C27-Land East of Constable House

I write you regarding the Camden Local Plan and specifically site C27 Land East of Constable House, Adelaide Road and proposed Gypsy and Traveller site

As an owner of a property located very near to this proposed site we wish to raise our objections in the strongest possible terms

The space itself is already crowded with various properties overlooking this particular location including the Eton flats where we own a property

In fact, this site is smaller than the size Camden recommended

We have serious concerns over the potential impact of the local community and surrounding areas and policing thereof

In addition, there would be the loss of local greenspace and open spaces of which are Camden Council initiatives

There would be as well a loss of playground facilities without any substitute

Lastly, the pros AI is inconstant with the Camden draft plan which seeks to provide new or improve spots for young people, improve access to nature and to deliver suitable drainage systems

I would also like to express my worries that there was no consultation with local residents regarding this site

We were only made aware a few days before the final date to submit regarding this draft plan

Kind regards

Lily, Maggiel and Olivier Scalongne

[redacted]

Envoyé de mon iPad

Responder 162

Date: Tue, 24 Jun 2025 11:00:56 +0000
From: James Berry
To: planningpolicy@camden.gov.uk
Subject: PCA Response - Camden Local Plan

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate page for each representation

Name or Organisation: **Property Care Association (PCA)**

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

D6- Basements

Policies Map

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

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

(3) Complies with the Duty to co-operate

Yes

No

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

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

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

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

X

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

X

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

(4) Consistent with national policy

X

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

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

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

While the Property Care Association is generally supportive of the aims of Policy D6, we are concerned that it places an unduly restrictive emphasis on basement development compared to other forms of construction, such as single-storey above-ground extensions or loft extensions. The policy appears to suggest that basements present uniquely high risks, which may not always be the case when appropriate design and mitigation measures are implemented.

We share the Council's concerns about potential impacts on groundwater and local flood risk. However, we believe these risks can be effectively managed through adherence to recognised industry standards. The Property Care Association (PCA), a trade body which represents specialist sectors including those working in below-ground structural waterproofing and flood resilience, offers robust technical guidance that could usefully inform the Council's approach. Encouraging or requiring the use of PCA-registered professionals, who are independently audited and work to high technical standards, would significantly reduce the risk of poorly executed basement works.

We also question the rationale for limiting basement extensions to within the footprint of the original building. This approach appears unnecessarily restrictive, particularly when above-ground extensions are frequently permitted beyond the original building envelope. Where site conditions allow, extending basements under parts of the garden or side return can often be delivered responsibly without adverse impacts, while preserving external space and reducing visual impact.

Basement development, when properly executed, can also preserve more garden and amenity space than above-ground alternatives. A single-storey rear or side extension is far more likely to reduce outdoor space, which is increasingly valued for biodiversity, drainage, and wellbeing. Where carried out with this in mind, this would support Camden Council's objective, set out at CC1 to protect existing green spaces with this maintenance, supporting the absorption of water which could reduce the risks from above-ground flooding. In this respect, basement development can offer a more sustainable and discreet solution, particularly in high-density areas.

Furthermore, we would challenge the assumption that basement construction creates greater disruption than above-ground building work. Both types of development involve similar levels of structural work, plant use, noise, and material deliveries. With effective site management and communication, disruption from basement works can be no greater, and in some cases less, than comparable above-ground construction.

(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.

Based on our response to point six above, we would welcome a balanced and evidence-based policy approach, which supports well-designed and professionally managed basement development alongside other forms of extension and evaluates proposals on their merits rather than through blanket restrictions.

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

We would be delighted to contribute to any proposed examination and provide further evidence and data on basement and waterproof design and installation.

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

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

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

Privacy Notice

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

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

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

11. Signature:		Date:	23/06/2025
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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.

Responder 163

Date: Tue, 24 Jun 2025 12:05:43 +0100
From: Nik Leitner
To: [redacted]
Subject: Representation Form (Site Allocation C27)

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

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

> To whom it may concern,
>
> I would like to make the following representation re Site Allocation C27
>
> Thank you and best regards
> Nik Leitner
>
>
>

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

Part B – Please use a separate page for each representation

Name or Organisation: Nik Leitner

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

Documents can be found at the following links:

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

Paragraph Policy Policies Map

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

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

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

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

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

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

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

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

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

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

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

1. Loss of Functional Amenity Space Used by Residents

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

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

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

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

2. Overlooking and Harm to Privacy - Amenity Impact

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

This contravenes:

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

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

3. Flood Risk - Inappropriate for Highly Vulnerable Use

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

Contrary to:

- NPPF Paragraph 167;

- PPTS para. 13(g).

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

(Continue on a separate sheet if necessary)

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

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

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

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk.

(Continue on a separate sheet if necessary)

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

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

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

☒ No

☐ Yes

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

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

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

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

Privacy Notice

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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:	23/6/25
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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



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

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

4. General advice

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

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


From: 
To: 
Cc: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)
Subject: 24 June 2025 12:26:24
Date:

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

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

To: Camden Council Planning Policy Team

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

My name is Jo Vaizey and I live in  —
located near the proposed site.

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

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

1. Loss of Valued Community Amenity Space

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

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

2. Overlooking and Loss of Privacy

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

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) – sites should not

place undue pressure on local infrastructure or cause conflict with settled communities;

- Article 8, European Convention on Human Rights (right to respect for private and family life);
- Moore v SSCLG [2013] EWCA Civ 1194 – established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

Deliverability is therefore highly questionable.

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

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

Conclusion and Requested Action

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

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

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

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

Kind regards,

Jo Vaizey

Date: Tue, 24 Jun 2025 12:27:20 +0100

From: Kadambari Prasad

To: [redacted]

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

To: Camden Council Planning Policy Team

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

I submit this representation as [redacted], [redacted postcode] - located directly opposite the proposed site - to object in the strongest possible terms to the proposed allocation of Site C27 - Land East of Constable House, NW3 3QA - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

Many thanks
Kadambari Prasad
[redacted address]

1. Loss of Valued Community Amenity Space

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

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

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- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

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

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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.

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Conclusion and Requested Action

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

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

Responder 166

Date: Tue, 24 Jun 2025 12:33:00 +0100
From: Freeman, Hadley
To: [redacted]
Subject: Camden Local Plan Proposed Submission Draft

Hadley Freeman

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Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate page for each representation

Name or Organisation:

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

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

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

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

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

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

*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 consider the Plan not to be justified or sound or positive or deliverable in that in H11 on pp. 294-5 it proposes to insert a Travellers site on Adelaide Road adjacent to a housing block Constable House.

This is adjacent to a housing block, Constable House and is not appropriate here. Travellers sites are not suitable for a residential area like this one in NW3. The travellers bring a life style which is unlawful, illegal,

antisocial and disturbing to the quiet enjoyment of residential life people in this part of Camden expect and have been living for many years. It is near three churches and a nursery school, with two secondary schools within a half mile in each direction. Travellers on this site will present a threat to young children and schoolchildren. They will also harm the quiet enjoyment of their locality at present experienced by residents.

Regarding the points given in the draft policy:

1. The Council will require new sites, pitches and/or plots for travellers to:
 1. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
 2. be capable of connection to energy, water and sewage infrastructure;
 3. provide safe access to and from the main road network;
 4. support the health and well-being of occupiers;
 5. provide an appropriate layout and facilities;
 6. provide a good level of residential amenity;
 7. be attractive and of the highest design quality; and
 8. protect local amenity and the environment.

I consider the following to be not met by the proposal of this site:

1. support by local infrastructure – the local infrastructure is in no way set up to cope with the problems from a travellers site. The police cannot control the local area adequately due to manpower problems, as seen in the Primrose Hill park problems a few years ago, the Park Police has been disbanded, etc.
4. support the health and wellbeing of occupiers – a travellers site here can only threaten the health and wellbeing of other nearby local occupiers
- 5 & 6, provide appropriate layout and facilities and a good level of residential amenity : the very small site beside Constable House is clearly inadequate to provide either of these
7. If the site is set up to be attractive and of the highest design quality the arrival of travellers will soon inevitably destroy any attractiveness here and good design will be trashed and destroyed by the travellers as they do at all other sites.
8. Protect local amenity and the environment – travellers here will overflow the site and pervade local areas to the north and south, with quiet residential roads well looked after by local residents soon becoming no-go areas patrolled by the travellers.

The committee or consultants who presented the plan for this site as a travellers site for the Local Plan was very misguided and perhaps not acquainted with the local area here.

This draft plan for a travellers site needs to have Adelaide Road removed from the Local Plan. I urge the Camden Council local plan committee to remove this part of the proposal.

H Freeman

[REDACTED]

(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.

This part of the Draft Local Plan in H11, pages 294-5 on the Travellers Site in Adelaide Road needs to be removed from the Draft Local Plan submission in order to make it at all acceptable or sound.

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

Privacy Notice

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

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

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

11. Signature:	P J White	Date:	23.06.25
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Notes to accompany the Representation Form

1. Introduction

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

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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.

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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: Tue, 24 Jun 2025 12:39:53 +0100
From: Mary-Rose Beamish
To: [redacted]
Subject: Fwd: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

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

PERSONAL DETAILS

Name: Mary-Rose Beamish

[redacted]

[redacted]

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

OUTLINE OF OBJECTION/REPRESENTATION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

• :

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

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

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

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

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

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

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

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

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

Conclusion

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

Thank you,

Mary Rose Beamish

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From: 
To: [PlanningPolicy](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 24 June 2025 12:42:25

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

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

To: Camden Council Planning Policy Team

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

We submit this representation on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, NW3 2BU — located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

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

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

- NPPF Paragraphs 99-101 (protection of open space);
- London Plan Policy S4 (ensuring sufficient play and informal recreation);

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

We therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and

Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Sincerely,

Neha Patel

[REDACTED]

[REDACTED]

Date: Tue, 24 Jun 2025 11:44:20 +0000
From: yelena.gaufman
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

To be very clear here is an **outline of my objection/representation**.

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

My reasons include:

- Loss of local green space

I've seen new trees and wildflowers planted here in the last few months. My understanding is that it's part of the Communi Trees project in association with Camden Council. Young people have been chosen to look after the trees. The proposal would mean getting rid of all the plantings as well as some mature trees (at least 30 of them).

This space is used as a playground. If the site is developed this would be lost to the current residents and there are no alternatives close by.

- Overlooking

This is overlooked on all sides.

- Flood Risk

This site is in a flood risk zone which is contrary to para 13 Government Traveller Sites Planning Policy.

- No independent access

This will cause massive disruption to the residents of Constable House.

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

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

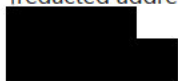
Conclusion

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

I wish to participate at the examination hearings before the Inspector.

Thank you,
Yelena Gaufrman

[redacted address] [redacted postcode]



Responder 170

Date: Tue, 24 Jun 2025 11:51:33 +0000
From: Jackie Ashley
To: planningpolicy@camden.gov.uk
Subject: response to plan

Jackie Marr

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

Part B – Please use a separate page for each representation

Name or Organisation:

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

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

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

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

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

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

*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 consider the Plan not to be justified or sound or positive or deliverable in that in H11 on pp. 294-5 it proposes to insert a Travellers site on Adelaide Road adjacent to a housing block Constable House.

It is a small site with very little space, which is already in full use by local residents for children to play outside and for dog walking.

This is a residential area and is not suitable for a travellers site. The travellers bring a life style which is unlawful, illegal, antisocial and disturbing to the quiet enjoyment of residential life people in this part of Camden expect and have been living for many years. It is near three churches and a nursery school, with two secondary schools within a half mile in each direction. There are already a number of rough sleepers outside Chalk Farm tube station and the addition of travellers will only make the area seem rougher and less welcoming to the many children to live and go to school in the area.

Regarding the points given in the draft policy:

1. The Council will require new sites, pitches and/or plots for travellers to:

1. be accessible to public transport, services and facilities, and be capable of

support by local social infrastructure;

2. be capable of connection to energy, water and sewage infrastructure;

3. provide safe access to and from the main road network;

4. support the health and well-being of occupiers;

5. provide an appropriate layout and facilities;

6. provide a good level of residential amenity;

7. be attractive and of the highest design quality; and

8. protect local amenity and the environment.

I consider the following to be not met by the proposal of this site:

1. support by local infrastructure – the local infrastructure is in no way set up to cope with the problems from a travellers site. The police cannot control the local area adequately due to manpower problems , as seen regularly in Primrose Hill park. There are no park police any more and the regular police are often unable to deal with the existing anti-social behaviour and drug use in the area, particularly in the summer months.

4. support the health and wellbeing of occupiers – a travellers site here can only threaten the health and wellbeing of other nearby local occupiers

5 & 6, provide appropriate layout and facilities and a good level of residential amenity : the very small site beside Constable House is clearly inadequate to provide either of these

7. If the site is set up to be attractive and of the highest design quality the arrival of travellers will soon inevitably destroy any attractiveness here and good design will be trashed and destroyed by the travellers as has been seen at other sites.

The committee or consultants who presented the plan for this site as a travellers site for the Local Plan was very misguided and perhaps not acquainted with the local area here.

This draft plan for a travellers site needs to have Adelaide Road removed from the Local Plan. I urge the Camden Council local plan committee to remove this part of the 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.

This part of the Draft Local Plan in H11, pages 294-5 on the Travellers Site in Adelaide Road needs to be removed from the Draft Local Plan submission in order to make it at all acceptable or sound.

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

Privacy Notice

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

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

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

11. Signature:	J Marr	Date:	24.06.25
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

Date: Tue, 24 Jun 2025 11:58:47 +0000
From: John Cottrell
To: PlanningPolicy
Subject: Draft New Camden Local Plan

[You don't often get email from [redacted]
[redacted]]

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.

My representation concerns site allocation C27, Land adjacent to Constable House, Adelaide Road to be used for Gypsy and Traveller accommodation:

I cannot imagine how this site can be considered for development. It is the garden setting for a fine 1954 building by Louis de Soissons. Currently, the boundary to the street is a very low wall, making this garden is one of the few substantial patches of grass visible from the street in the immediate area. It is not just an amenity for the residents of Constable House and passers-by. It also provides breathing space for the high density development at Eton Place, opposite. In the near future, this will be joined by a large hotel and apartment complex next to Chalk Farm Underground Station.

The proposal to develop this garden conflicts with these Local Plan Policies:

Policy NE1 A5: protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;

Policy NE2 A7: recognise the biodiversity value offered by gardens and soft landscaping

Also, read sections 11.10 - 11.16 concerning protection for local green spaces. Are these just empty words?

--
John Cottrell
[redacted address]
[redacted]

Date: Tue, 24 Jun 2025 08:05:55 -0400

From: Matthew Gamser

To: [redacted]

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

As an owner of a [redacted] I wish to object in the strongest possible terms to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) - sites should not place undue pressure on local infrastructure or cause conflict with settled communities;

- Article 8, European Convention on Human Rights (right to respect for private and family life);
- Moore v SSCLG [2013] EWCA Civ 1194 - established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

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

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

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

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

Conclusion and Requested Action

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

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

I trust that you will reconsider this very unsound decision and find a more appropriate site for this facility.

Yours sincerely

Matthew Gamser

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responder 174

From: 
To: [PlanningPolicy](#)
Cc:
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 13:14:00

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To: Camden Council Planning Policy Team

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

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

PERSONAL DETAILS

Name: Dr Haroun Butt

Address: [REDACTED]

Email address: [REDACTED]

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

1. Loss of Valued Community Amenity Space

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

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

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

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The proposed use would result in a highly constrained site being hemmed in by existing

multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

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

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) – sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
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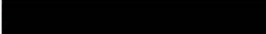
We therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

I look forward to hearing from you.

Kind regards,

Haroun

From: 
To: [PlanningPolicy](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 24 June 2025 13:20:03

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To: Camden Council Planning Policy Team

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

We submit this representation on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, NW3 2BU — located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

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April Boon

From: [REDACTED]
To: [PlanningPolicy:](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 24 June 2025 13:32:56

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To: Camden Council Planning Policy Team

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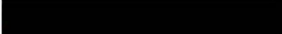
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From: 
To: [PlanningPolicy](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 13:33:22

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

Dear sir or madam

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Yours sincerely,

Willemien Vroom



From: [REDACTED]
To: [Planning Policy](#) Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)
Subject: Traveller Site
Date: 24 June 2025 13:36:52

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FAO: Camden Council Planning Policy Team

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

My name is Daniel Jackont and I live [REDACTED] located near the proposed site.

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

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

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conditions unacceptable for both current residents and future site occupants. This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study

(GTSIS) clearly applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access.

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

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

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

Kind regards,

Daniel J

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Daniel Jackont



Responder 179

Date: Tue, 24 Jun 2025 12:38:59 +0000
From: Cathy Black
To: PlanningPolicy
Subject: Fwd: Site Allocation C27 - Land East Of Constable House, Adelaide Road
(Gypsy And Traveller Site) Of Draft Local Plan.

Begin forwarded message:

From: [redacted email]
Date: 23 June 2025 at 23:29:48 BST
To: Nasrine Djemai <[redacted email]>, Kemi Atolagbe <[redacted email]>, Rebecca Filer <[redacted email]>
Cc: Catriona Black <[redacted email]>
Subject: **Site Allocation C27 - Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.**

To: Camden Council Planning Policy Team

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

We submit this representation as the owner of [redacted] London [redacted postcode] - located directly opposite the proposed site - to object strongly as leaseholders and on behalf of our tenants to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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However:

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to Site C27.

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Conclusion and Requested Action

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

Alexander Black

[redacted]

[redacted address], [redacted]

[redacted]

[redacted]