

Responder 304

Date: Wed, 25 Jun 2025 15:06:00 +0000
From: Marcos Gold
To: PlanningPolicy
Subject: The Fitzrovia Partnership Response to Camden Local Plan

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

By Email: planningpolicy@camden.gov.uk

Dear Planning Policy team,

RE: Camden draft new Local Plan 2025 – The Fitzrovia Partnership response

The Fitzrovia Partnership (TFP) welcomes the opportunity to engage at this stage of the consultation. As the recognised business improvement district (BID) for Fitzrovia, TFP represents the voice of businesses and their employees, and seeks to support them through advocating for better policy. It delivers services including additional security, cleansing, destination marketing, placemaking, public realm improvements, greening and nature recovery and sustainability support. It convenes stakeholders to ensure Fitzrovia is an economically vibrant destination, offering tangible and collective benefits to businesses, workers, residents and visitors.

We note at the Regulation 19 stage of the process that the response is focused on soundness, duty to co-operate and legal compliance. We have attached the response form that responds accordingly. However, we feel important to stress the below, as previously outlined in our response at the Regulation 18 stage.

TFP supports Camden Council in protecting retail clusters, noting that Specialist Shopping Areas are designated to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors. This is why the designation of Charlotte Street is welcomed, allowing the clusters of food and beverage offer to continue to thrive.

We continue to encourage the definition of the Specialist Shopping Area to include Mortimer Street, Charlotte Place, Rathbone Place, Windmill Street, Percy Street and the south gateway to Goodge Place (noting that this area spans the borough boundary), in order to create a distinctive, coherent and connected food and beverage cluster, while also retaining local and independent small businesses and shops. To secure Charlotte Street's future as a Specialist Shopping Area, we consider that its policy designation needs to be translated into a set of detailed policies and actions, such as a High Street Action Plan. This would help unlock investment opportunities to guide the delivery of public realm improvements, allowing for new and improved routes and connections as well as wayfinding measures and urban greening.

TFP supports an evening time economy in this area, and welcomes efforts to widen the range of activities on offer, as well as investment in infrastructure to ensure that everyone out after dark feels safe and welcome. The proximity of UCL hospital and university campuses in particular require support with regards to the objectives set out in Camden's Evening and Night-time Economy Strategy, as well as the delivering of high quality public realm.

We note the recognition in the new Local Plan that development is almost complete on Tottenham Court Road, and that the focus of the Council is now on Euston. However, we urge the

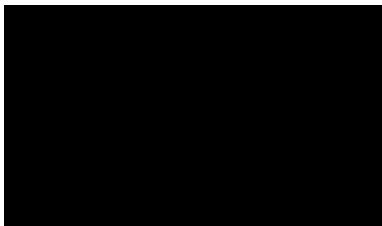
Council to ensure that S106 and Community Infrastructure Levy allocations from sites should be invested in an accelerated fashion in the Fitzrovia area, specifically on key public realm, cycling and walking and greening projects, including Warren Street, Charlotte Street and Chitty Street.

We recognise that the sale of the BT site has come forward recently and set out an ask that this be given appropriate weighting in the new Local Plan through a site allocation.

We welcome Camden's approach to sustainability, in particular achieving net zero carbon, and have developed a Sustainability Action Plan for the area. We celebrate buildings that have been designed and constructed to adapt to and reduce, the effects of climate change. We ask that Fitzrovia is given a new designation in the Local Plan, which is as Camden's first 'Fast Zero' Community, with a set of supporting planning policies to accelerate progress towards Net Zero Carbon in 2030.

TFP is encouraged by the Local Plan's scope, ambition and inclusivity, and look forward to working in partnership with the Council to deliver a sustainable borough that supports good economic growth, healthy communities and a welcoming place for all.

Yours faithfully,



Marcos Gold



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*

**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.*

2.

Agent's
Details (if
applicabl
e)

Title

Mr

First Name

Marcos

Last Name

Gold

Job Title

(where relevant)

Organisatio
n

(where relevant)

Address

Line 1*

Address

Line 2

Post Town*

Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: The Fitzrovia Partnership

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	<input type="text" value="3.42"/>	Policy	<input type="text" value="G.1. S.1"/>	Policies Map	<input type="text" value="Figure 10"/>
	<input type="text" value="3.7"/>		<input type="text" value="S.1.S"/>		<input type="text" value="Figure 06"/>

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

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

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

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

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

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

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

(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

*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.

<div></div> <div>(Continue on a separate sheet if necessary)</div>
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7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

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.

BT Tower

We propose a new site allocation for the BT Tower site. The BT Tower became a new development site only after the previous Local Plan consultation stages. We consider this allocation to be reasonable, and argue that guidance for the site is now necessary in order to ensure the effectiveness of the plan. Within the context of delivering and maximising good growth, supporting jobs, protecting surrounding amenity and heritage (The Tower is a Grade 2 Listed Building), and improving the public realm, the site allocation would allow for the site to come forward maximising its potential. An allocation here would allow for detailed guidance to be set out and adhered to with regards to sustainability, design and heritage, quality of design and build, inclusivity and accessibility, as well as job creation and safety.

Policies:

DS1, CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8, CC9, CC10, CC11, D1, D2, D3, D4, D5, NE1, NE2, IE1, IE2, IE3, IE4, IE5, IE6, T1, T2, T3, T4, T5, A1, A2, A3, A4, SC1, SC2, SC3, SC4, SC5, SC6, H6, H8

Charlotte Street

The new draft Local Plan designates Charlotte Street as a 'Specialist Shopping Area'. We encourage the definition of the Specialist Shopping Area to include Mortimer Street, Charlotte Place, Rathbone Place, Windmill Street, Percy Street and the south gateway to Goodge Place (noting that this area spans the borough boundary), in order to create a distinctive, coherent and connected food and beverage cluster, while also retaining local and independent small businesses and shops. Policy S.1.Q. states that Camden Council will support and protect Specialist Shopping Areas to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors. As part of this, the Council will continue to manage the location and concentration of food, drink and entertainment uses in this area and their impact.

We recommend that the named streets are required to be included for the policy to reach full effectiveness, with regards to creating and nurturing a coherent and connected food and beverage cluster.

For the policy in the new draft Local Plan to be effective, specifically to secure Charlotte Street's future as a Specialist Shopping Area, its policy designation needs to be translated into a set of details policies and actions, such as a High Street Action Plan and investment in placemaking proposals for both the day time and evening economies. The Charlotte Street food and beverage cluster can perform much better as an economically vibrant eco-system of businesses with investment in its public realm and supportive

policies. We propose that the policy designation of Charlotte Street should be translated into detailed set of policies and actions, such a High Street Action Plan and investment in public realm and placemaking proposals for both the day-time and evening economies.

(Continue on a separate sheet if necessary)

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

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

☒ No

☐ Yes

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

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

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

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

Privacy Notice

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

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

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

11. Signature:		Date:	25 June 2025
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

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.

To: Camden Council Planning Policy Team

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

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

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

safe vehicular access.

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

Regards

Anne-Lise Miller [REDACTED]
[REDACTED]

Date: Wed, 25 Jun 2025 16:37:00 +0100
From: Lisa Gunn
To: [redacted]
Subject: Proposed 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.

[redacted]

Kind regards
Lisa Gunn.

Sent from my iPhone

Responder 307

Date: Wed, 25 Jun 2025 15:42:02 +0000
From: shanti Rebello
To: PlanningPolicy
Subject: Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)

I have recently heard that you are proposing to use this tiny piece of land as a Gypsy and Traveller site.

A proposal such as this should have been brought to the attention of the Primrose Hill Community Association, for more timely consultation.

I am writing to argue against this proposal.

As a local resident, I pass by this site every day. I have always considered it a part of Constable House. Its residents and local kids use it as a safe space to recreate and play. Having people(how many?) living of this site would result in overcrowding and being overlooked each by the other, as it affords no separation or privacy.

How do you propose to provide the facilities additional individuals and families would need? It seems to me a recipe for insecurity and for friction.

I would urge you, please, to re consider..

Yours sincerely,

Anne Rebello
[redacted address]

Date: Wed, 25 Jun 2025 16:04:58 +0000
From: Nick Benwell
To: PlanningPolicy
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

PERSONAL DETAILS

Name: Nicholas Benwell and Emma Worwood

[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 apparent 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 hard surfaced 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.
- 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.

Unknown scope of proposal: There also seems to be uncertainty as to the exact scope of the proposal. While the documents available on the Council's website show both the play area and the green area being subject to the proposal, with five families being accommodated, some neighbours have received informal indications from the Council that the area covered by the proposal is in fact (or is now) the play area only, and that it would accommodate two families. If that is correct, the varied proposal does not seem to appear in any document issued by the Council.

Consultation: There has also been no consultation whatsoever with local residents in relation to the proposed use of this site (whatever its scope). It seems that most residents, including of the Etons and Constable House, only became aware of the proposals in the last 10 days, as a result of rumours via neighbours. This is entirely unsatisfactory in relation to such a significant proposal (and contrasts with the detailed recent consultation by the Council regarding the installation of an e-bike parking zone on Eton Villas, which has included a detailed leaflet and plan being provided to all local residents).

Conclusion:

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

It seems to us that there is a real opportunity for the Council to improve the play area by using some of the public open space contribution that we understand has been required from the developers as part of the 5-[redacted address] development, thereby helping to meet the Council's commitment under the Local Plan to deliver enhanced play spaces.

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

From: S
To: [Nasrine Djemai \(Cllr\)](#); [Kemi Atolagbe \(Cllr\)](#); [Rebecca Filer \(Cllr\)](#); [PlanningPolicy](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 25 June 2025 17:13:38

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To: Camden Council Planning Policy Team

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

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

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

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

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multi-storey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite,

creating conditions unacceptable for both current residents and future site occupants.

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

Site C27 presents all four of these exclusionary criteria and should not have

progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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.

Kind regards.

Ajay Sud

Responder 310

Date: Wed, 25 Jun 2025 17:02:38 +0000
From: Diane May
To: planningpolicy@camden.gov.uk
Subject: Camden's Submission Draft Local Plan 2025 : OBJECTION?
MODIFICATION TO SITE ALLOCATION C27 FOR GYPSY AND TRAVELLORS
SITE.

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OBJECTION TO THE ALLOCATION OF LAND ADJACENT TO CONSTABLE HOUSE AS A GYPSY AND TRAVELLERS SITE [C27] IN CAMDEN'S SUBMISSION DRAFT LOCAL PLAN and PROPOSED MODIFICATION

1. Personal Details

Diane May



2. Objection/Representation relates to

Chapter 4 Central Camden: Figure 8 – Site allocations in Central Camden; **Table 5** - Further site allocations in Central Camden: **C27** Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation.

Chapter 7: Meeting Housing Needs: Policy H11 Accommodation for Travellers **C2. C27** - Land adjacent to Constable House, Adelaide Rd

Draft Policies Map and **Schedule of Proposed Local Plan Site Allocations C27** Land to the East of Constable House

3. Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation and from the following Sections of the Submission Draft Local Plan.

Chapter 4 Central Camden: Figure 8 – Site allocations in Central Camden; Table 5 - Further site allocations in Central Camden: C27 Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation.

Chapter 7: Meeting Housing Needs: Policy H11 Accommodation for Travellers C2. C27 - Land adjacent to Constable House, Adelaide Rd

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations C27 Land to the East of Constable House.

The land should be allocated for local [preferably public] open space and playground.

JUSTIFICATION for the PROPOSED MODIFICATION

Unsuitable/Inappropriate Use of the Site: The Site is Unsuitable for accommodation for Gypsy and Travellers and does not meet the Council's criteria for allocation as such.

4. The Site:

This is a highly visible site located at the junction of Adelaide Road and Eton College Road. The site is held freehold by the Council. It lies within the curtilage of Constable House and currently and historically forms part of the surrounding open space/amenity area, together with a playground, for use by residents. The use of the site for Gypsies and Travellers will be a serious loss to the amenity of residents of Constable House and the wider area. This is an area recognised by the Council as a '*densely built-up area*' which is '*currently deficient in public open space*' and where in the development currently under construction directly

opposite the site (5-17 Haverstock Hill) it has sought a S106 contribution of £100,457 'to create/improve open space provision within the surrounding area'.

- 5. Constraints** applied in the process of site identification and selection appear not to have been applied in the case of C27 - Land to the East of Constable House. Nowhere in supporting documents has any analysis/assessment been made of the suitability of site C27 for Gypsy and Travellers accommodation as follows:
- *Amenity space associated with housing estates:* Such sites are generally considered by LB Camden to be 'unavailable and unsuitable', because availability of and access to Council housing and private open space of Council tenants is already constrained by the dense urban nature of the borough and high land values. [Ref Gypsy and Travellers Site Identification and Selection Report November 2024 -Para 2.23]. The proposed use of the site for Gypsy and Travellers accommodation would result in a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location currently deficient in public open space and play space as recognised by Camden in its decision making.
 - *There is no independent access* to the allocated site east of Constable House and serious disruption is likely to be caused to residents of Constable House. Part of the site - the playground/kick-about area - can only be accessed by steps, complicating future vehicle access arrangements.
 - *Important local green/open space:* The site has historically been used as amenity space and playground associated with Constable House (eg OS map 1964). As an amenity space and playground, it remains an important asset to Constable House residents and the wider community as well as the biodiversity of the area, supporting many mature trees and wildflowers. It is currently managed by Communi-trees a tree planting project aiming to engage/involve young people in nature, sponsored by the KOKO Foundation and supported by the Council. Such land should be excluded from development and is protected under the objectives and policies of the adopted and emerging Camden local plan, in accordance with NPPF 2024 Paras 104 and 107 and London Plan Policy G4. There are no other sites available in the area that could support open space and playground use.
 - *Overlooking and Privacy:* The site is overlooked on all sides by buildings over 4 storeys. 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 (identified as C25 in the schedule of allocated sites); 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 heavily trafficked, key east west route and busy bus route between Swiss Cottage and Chalk Farm. This location will have serious implications for the privacy of the occupants of a Gypsy and Travellers site.
 - *Flood Risk:* Adelaide Road is identified as 'surface water' flood risk. The amenity area / playground suffered significant flooding in 2023 and 2024.

For these reasons site C27 has been wrongly allocated for a Gypsy and Travellers site and this allocation should be deleted. The site should be designated as a local green space/open space and playground and a contribution made to its improvement and upkeep as set out in the S106 Agreement associated with the nearby development at 5-17 Haverstock Hill.

6. There has been No Consultation on the Allocation of land to the East of Constable House as a Gypsy and Travellers site – generally or specifically with Constable House residents and local residents/neighbours adjoining the site.

- No information, studies or allocations for Gypsy and Travellers sites were made in the Consultation Draft New Local Plan January 2024. A policy H11 Accommodation for Travellers, sought to protect existing sites, secure future sites and an intention to identify 16 additional pitches by 2030/31 according to listed criteria.

The two selected/allocated sites did not form part of any consultation until the publication of the Submission Draft Local Plan in May 2025.

- Notice of a consultant's report (Gypsy & Travellers Site Identification Study [GTSIS] published in November 2024) was by Newsletter posted on the Council's website on *24th December 2024* requiring responses by 29th January 2025. The GTSIS short listed 18 Council freehold sites for Gypsy and Travellers, stating that 'LBC intends, subsequent to GTSIS, to undertake more detailed site-specific assessment'. Land to the east of Constable House was listed amongst the 18 sites identified for further Council officer assessment with related para 3.3 stating 'There are individual sites and portions of these areas of opportunity that would not be acceptable, for instance because of industrial uses, presence of railway lines, or loss of estate open space'

• In April 2025 Officers published a 'Site Selection Topic Paper' which ruled out 16 sites on the basis that they were either unsuitable or unavailable. Para 4.12 states 'The two remaining sites have been allocated in the Local Plan (Regulation 19 version) as sites for Gypsy and Traveller accommodation.' These two sites were not identified nor was any analysis or assessment provided of the basis on which they were selected.

Not until this late stage – May 2025 - of consultation on the Submission Draft Local Plan 2025 has it been possible to see that Land to the East of Constable House has been identified as a Gypsy and Travellers site C27. At no time have local organisations, residents of Constable House and surrounding areas been informed or consulted on this matter.

This is a failure in the consultation process and for the reasons listed above the Camden Draft Plan should be modified by the deletion of Site Allocation C27 for Gypsy and Travellers.

7. Yes, I wish to participate at the examination hearings
8. Yes, I wish to be added to the Council's consultation data base for all the next stages of the Camden Local Plan.

DM
25.06.2025.

Responder 311

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.

Alan Ball

Date: Wed, 25 Jun 2025 18:13:53 +0100
From: Christopher Cooke
To: [redacted]
Subject: Camden Local Plan - Possible allocation of land next to Constable House as a gypsy and traveller site

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<https://aka.ms/LearnAboutSenderIdentification>]

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I understand that an area to the east of Constable House near the junction of Adelaide Road and Eton College Road has been designated as one of the possible locations for a gypsy and traveller site.

I regard the site as unsuitable for the following reasons:

1. Although I understand that the site will now comprise only the asphalt playground of Constable House and not the grassy area next to it, the proposal will still involve cutting down a number of trees to create vehicular access and enough space for the site. Moreover, Constable House will presumably no longer have a playground for its residents.
2. The site is very close to a large number of flats and houses in an already densely populated area, including Constable House itself, several mansion blocks and houses in Eton College Road, and houses and flats in Provost Road. It will be overlooked by residents of all those houses and flats, and will limit the privacy of those residents and the users of the camp themselves.
3. Access to the site will have to be created in an already very busy and restricted space and will likely cause congestion. If access is from inside the Constable House area, it will be very inconvenient for its residents. If access is from Eton College Road, it will add to the congestion there.
4. I appreciate that the Council has legal obligations to fulfil in providing for such sites. However, I believe it is vital that the site that is chosen does not add to congestion in an already crowded area. Camden needs more open spaces, not fewer.

Christopher Cooke.
[redacted address],
[redacted postcode].

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Date: Wed, 25 Jun 2025 17:16:21 +0000

From: Claire Nightingale

To: [redacted] planningpolicy@camden.gov.uk,
[redacted]
[redacted]

Subject: Objection to the proposed move of Regis Road recycling centre.

I am alarmed by your proposal to relocate the Regis Road recycling centre to the Holmes Road Police Station site and redevelop the Regis Road site for housing and business use. We are frequent users of the recycling site and consider that it is already too small and congested for easy use. Moving the site to a smaller site on a narrower road will make the amenity harder to use, as well as create hazard and disruption for local residents, businesses and pupils at the local primary school. Recycling is such an important feature of a move towards a greener economy that reducing the access and convenience of the recycling centre is a crazy proposal.

In addition, the creation of additional housing at a time when Camden has a falling birth rate, sufficient to close several primary schools, when there are already huge numbers of flats being built, also seems a weird proposal. If they are occupied, the additional traffic that will be created **will be unbearable for local residents and businesses**, particularly when the traffic flow has already been severely disrupted by the relocation of bus stops into the centre of the road. It is challenging enough at present.

I urge you to re consider this proposal, which will prove to be enormously unpopular.

Yours faithfully,

Claire Nightingale

[redacted address], [redacted] [redacted postcode]

Date: Wed, 25 Jun 2025 17:34:34 +0000
From: ANTHONY DU VIVIER
To: PlanningPolicy
Subject: Fwd: traveller site near Chalk farm. C27

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>
> dear Sir/Madam,
> I was dismayed to learn at this 11 hour that you propose to build a permanent term for travellers next door to chalk farm tube station. I am uncertain why you have given us such a short time to respond.
> Certainly I would imagine that a considerable number of people would object to this
> 1. it is going to cost a lot of money which actually could be much better spent on making camden safe and clean. Most of us avoid Camden town tube station at night because petty crime is common place and I can see that happening at Chalk farm train station which at the moment most elderly people regard as relatively safe.
> 2.this is a quiet residential area and it is also a much needed green space.
> 3. Travellers by definition are mobile people so what is your logic in setting up a permanent encampment?
>
> It would be very good to hear your views as to what the advantages and disadvantages are of this proposal but I do not think it is a wise idea.
> I look forward to hearing from you
> Yours sincerely
> Anthony du Vivier
> [redacted address], [redacted postcode]
> Sent from my iPad
>

Responder 315

Date: Wed, 25 Jun 2025 19:00:47 +0100
From: [redacted]
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan

Paul Watkins RIBA

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="Paul"/>	<input type="text"/>
Last Name	<input type="text" value="Watkins"/>	<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:

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, opposite a large current building site, and opposite The Eatons blocks of flats on Eaton Road.

Firstly I understand that no detailed consultation has been undertaken on this proposed scheme with any of the local residents of Constable House or

any of the other numerous housing developments within the neighbourhood, which surely invalidates the proposal.

It is hard to imagine a site less appropriate to accommodate travellers and their vehicles than this one. The existing hard surfaced area has a single stepped entrance approached from Eton Collage Road. I understand that it was originally a play area for local children, a far more appropriate use of this site. It is surrounded and overlooked by many substantial residential buildings. Travellers' sites invariably result in an accumulation of trash which will destroy the quality of environment currently enjoyed by both residents and passersby in both Eton College and Adelaide Road. The very pleasant community landscaped area fronting Adelaide Road would undoubtedly soon become an extension to the travellers site, and its gardens destroyed, both physically and visually.

As a local resident and frequent user of public transport at Chalk Farm, I strongly object to the proposal.

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.

Paul Watkins, [REDACTED] [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.

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

Privacy Notice

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

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

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

11. Signature:	Paul Alan Watkins	Date:	25 June 2025
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)
Date: 25 June 2025 19:19:01

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

[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

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/1/2151483 (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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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 William Page

Date: Wed, 25 Jun 2025 19:27:36 +0100
From: Sandy Lieberman
To: [redacted]
Subject: Travellers 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.

Travelers seem to be an euphemism for homeless.
This sounds like madness having read your proposal.

Definitely object to this!

Sanford Lieberman



From:
To: [PlanningPolicy](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 25 June 2025 19:43:58

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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.

Re: 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)

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- 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

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

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The 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

Claudine Zwirn

Sent from [Outlook for iOS](#)

From:
To: [PlanningPolicy](#)
Cc: [Kemi Atolagbe \(Cllr\)](#); [Rebecca Filer \(Cllr\)](#); [\[redacted\]](#)
Subject: Camden Council Draft Local Plan - Objection to site allocation C27 (Gypsy and Traveller site)
Date: 25 June 2025 19:54:28

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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.

FOA: Camden Council Planning Policy Team:

RE: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025):-
Land east of Constable House, Adelaide Road.

Dear Camden Council Planning Policy Team,

I live in [redacted], located near the aforementioned proposed site.

Please accept this communication as a formal OBJECTION to site C27 as outlined below.

Personal Details:

Carla Arando



OUTLINE OF OBJECTION / REPRESENTATION:

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

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

REASONS:

There are several key concerns that make this location unsuitable for such allocation; not to mention that the site itself is a small space and of great value

both socially and practically, to those living adjacent to it, i.e. Constable House and the local community.

1) OVERLOOKING AND LOSS OF PRIVACY:

The proposed use would result in a highly constrained site being hemmed in by existing multi storey residential blocks. The site is directly and heavily overlooked from all sides; from windows and balconies of neighbouring flats, of Constable House, as well as from Eton Hall, Eton Rise, and Eton Place (6 storey) immediately opposite; and the new 'taller' development being currently built next to Eton Place - at 5-17 Haverstock Hill. Along with the houses directly opposite on the Adelaide Road side.

C27 proposed site is an area of high footfall to and from Chalk Farm Tube Station and Primrose Hill Bridge; on the busy main Adelaide Road route; with continued increased traffic and noise due to proposed HS2 works; again imposing implications for the sites privacy and suitability.

Altogether creating conditions unacceptable for proposed future site C27 occupants and local residents.

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.**

2) 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.**

3) ACCESS CONSTRAINTS AND UN-DELIVERABILITY:

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. Site C27's border on Eton College Road, is lined with an allocated docking / rental area for Lime Bikes and scooters; and directly opposite Eton Place car parking entry / exit. Raising concerns over site C27 loss of privacy and serious concerns about overall safety and traffic flow in an already congested area. 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.

4) LOSS OF VALUED COMMUNITY AND GREEN 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, from the KOKO Foundation, involving young people and connects local residents with nature, acting as a springboard for climate action while simultaneously greening the borough, enriching biodiversity, **improving mental health and wellbeing**, and alleviating the impact of climate change.

Site C27 would put an end to this initiative and the removal of 'Communi-trees', trees and flowers planted, including the possible removal of other long and established planting.

The proposed site C27 includes a **'safe enclosed playground'** for the children and residents of Constable House. This facility would be lost without any substitute.

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.**

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 OF 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:

- Privacy / Overlooking;
- Inherent flood risk;
- Access constraints;
- Loss of Community & Green Space;
- 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 H11Draft 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.

I also request that I wish to participate at the examination hearings into the Draft Local Plan before the inspector.

Kind regards and 'Thank You' for your time and consideration

Carla Arando

From: [REDACTED]
To: [REDACTED]
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)
Date: 25 June 2025 20:03:36

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.

FAO: Camden Council Planning Policy Team

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

My name is Maria Nickolova [REDACTED]
[REDACTED]

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

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

1. Loss of Valued Community Amenity Space

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

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- Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

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Kind regards,

Maria Nickolova

Responder 321

Date: Wed, 25 Jun 2025 21:44:20 +0200
From: Michael C
To: [redacted]
Subject: Travellers

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

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

Dear Sir

I am extremely worried about the planning application for the ground at Adelaide Rd .
We already have some problems with the HS2 works and there is an on going problem with rough sleepers and begging in the area .

Michael

Date: Wed, 25 Jun 2025 20:50:34 +0100

From: Leigh Wallett

To: [redacted]

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

Representation: Objection to Proposed Allocation of Site C27 (Land Adjacent to Constable House, Adelaide Road) for Gypsy and Traveller Accommodation

Proposed Modification:

I respectfully request the deletion of Site Allocation C27 from:

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

Grounds for Objection

[redacted] wish to formally object to the proposed allocation of Site C27 for Gypsy and Traveller accommodation on a number of material planning grounds.

This site is fundamentally unsuitable for residential accommodation, and its allocation would result in significant harm to residential amenity, public open space, community cohesion, environmental quality, and local infrastructure. The allocation is also procedurally unsound in its failure to meet national and local policy requirements for site assessment, infrastructure planning, and meaningful community engagement.

My objections are as follows:

1. Harm to Residential Amenity

The site is immediately overlooked by multiple residential buildings - including Constable House, The Etons, Bridge House, Primrose House, and new developments on Haverstock Hill - and is located along one of the busiest pedestrian routes in the borough. The constant noise, activity, and lack of privacy make it entirely unsuitable for residential accommodation, undermining both existing residents' amenity and the future occupants' quality of life.

2. Unsuitability for Traveller Accommodation in Terms of Cultural and Social Needs

Traveller and Gypsy families typically require sites with privacy, outdoor space, and secure boundaries. This exposed, heavily trafficked urban site offers none of these, and would fail to provide a dignified, culturally appropriate living environment. The allocation risks placing families in unsuitable, poor-quality conditions, contrary to the aims of the Government's Planning Policy for Traveller Sites (PPTS) and Camden's Public Sector Equality Duty.

3. Loss of Informal Play Space

Local children from Constable House and nearby homes use the site as one of the few safe, informal outdoor play areas in the vicinity. Its removal would worsen an already significant shortfall in local play provision, contrary to Local Plan Policy A2 and London Plan Policy S4 (Play and Informal Recreation).

4. Access and Traffic Safety Concerns

The proposed access arrangements would conflict with an already constrained and congested section of Adelaide Road, opposite residential entrances and along a key pedestrian route to Primrose Hill. Additional vehicular movements and construction activity would compromise pedestrian safety, increase congestion, and harm local amenity.

5. Flood Risk and Surface Water Management Issues

The site has experienced repeat surface water flooding in recent years, especially around the play

area. No evidence has been provided demonstrating how these flood risks would be mitigated for new residential accommodation, putting future occupants and surrounding properties at risk, contrary to NPPF guidance and Camden's Local Flood Risk Management Strategy.

6. Poor Air Quality and Health Impact

Adelaide Road is a heavily trafficked arterial route, identified in Camden's Air Quality Action Plan as an area of poor air quality. Allocating residential accommodation - particularly for children and families - in this location would expose occupants to harmful pollution levels.

7. Potential for Overdevelopment of a Constrained Site

The site's limited size, constrained shape, it is smaller than the required minimum needed for planning permission. On top of that there is a lack of privacy, and proximity to busy roads and multiple residential buildings make it inherently unsuitable for further residential development. Allocation for permanent accommodation would represent overdevelopment, resulting in substandard living conditions, and would fail to meet national and local space and amenity standards.

8. Cumulative Impact with Other Developments

When considered alongside recent and proposed developments nearby, this allocation would intensify pressures on local infrastructure - including traffic, parking, school places, healthcare, and open space - without evidence of adequate mitigation or capacity assessments. The failure to consider cumulative impacts renders the proposal unsound.

9. Inadequate Infrastructure Planning and School Place Provision

There is no evidence that the allocation has been supported by an assessment of school place capacity, healthcare provision, or access to essential services. The absence of infrastructure planning undermines the sustainability and deliverability of the site.

10. No Evidence of Sequential Site Assessment

National policy requires local authorities to identify suitable, available, and deliverable sites for Traveller accommodation through a transparent site assessment process. There is no public evidence demonstrating why this highly constrained urban site was selected over potentially more suitable alternatives, raising serious concerns about the soundness and fairness of the process.

11. Absence of Meaningful Community Consultation

Local residents have not been meaningfully consulted on the proposed allocation of this site. The absence of engagement contradicts the principles of community participation set out in Camden's Statement of Community Involvement and undermines the credibility and legitimacy of the Local Plan process.


Conclusion

In light of the serious and wide-ranging concerns outlined above - including loss of open space, harm to residential amenity, inadequate infrastructure, environmental risks, procedural shortcomings, and the failure to provide an appropriate environment for Traveller families - I respectfully request that Site C27 be deleted from the Camden Draft Local Plan.

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

Yours faithfully,

Leigh Wallett



Responder 323

Date: Wed, 25 Jun 2025 20:55:26 +0100

From: julia chapman

To: [redacted]

Subject: Representation form C27 on Gypsy and Traveller site adjacent to
Constable house

Please find my completed representation form.

Best wishes

Julia Chapman

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

Part B – Please use a separate page for each representation

Name or Organisation:

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

C27

Policies Map

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

- | | | | | |
|--|-----|----------------------|----|--------------------------------|
| (1) Legally compliant | Yes | <input type="text"/> | No | <input type="text" value="X"/> |
| (2) Sound | Yes | <input type="text"/> | No | <input type="text" value="X"/> |
| (3) Complies with the Duty to co-operate | Yes | <input type="text"/> | 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="UNSOUND"/> |
| (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="UNSOUND"/> |
| (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="UNSOUND"/> |
| (4) Consistent with national policy | <input type="text" value="UNSOUND"/> |

*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.

In my view the allocation of a traveller site adjacent to Constable House on Adelaide Road is unsound and should be removed because:

1. Loss of a valuable amenity for the community.

This small but very important green area is used by the community, local residents and schoolchildren from the nearby Haverstock school use this important amenity. It has grass and flowers and also mature trees which are much needed in an inner city area. Constable house is directly adjacent and parents can supervise their children directly here. This space is particularly valuable in a densely populated area where there are not many open green spaces available to residents, particularly with HS2, where the works have removed mature trees already. This site has many mature trees which are important.. To develop this would be contrary

to a number of requirements in both the London plan policy and the Camden Local plan policy in regards to reducing the quality and variety of local amenities.

2. This area is at risk of flooding

The proposed site is contained within the Local flood risk zone and traveller accommodation is considered a 'highly vulnerable' use under planning practice Guidance

3. Overlooking and privacy,

The proposed site is within a very urban area already and is already overlooked by the multi storey residential blocks of Constable house and those on Eaton College Road. There is a massive new development currently being built adjacent to Chalk Farm Station, which will also overlook this site. This new site will undermine privacy for local residents and also potential traveller occupants

4. There are significant access issues on this small heavily trafficked corner plot

This site is on a corner, it is a main road and heavily trafficked,. This has been made worse by HS2 works and lorries. Although the HS2 work is being paused, it will start again and take decades to complete, and this will mean that potential residents in trailer accommodation which does not have the soundproofing and insulation of modern homes, will be subject to noise and pollution. It is across from a railway, this choice of site is not a respectful place for travellers to live. There is also no independent access for large vehicles to the site for trailers, lorries and emergency vehicles.

There could be potential safety risks and security risks.

5. Visual impact

This is a valuable local green area, to build on it, and allocate its use to the travelling community will have a significant visual impact. I have seen other traveller sites and they have a significant visual impact, with lorries, trailers, cars and equipment, which is completely out of keeping with this area.

6. Size

This is a very small site and once the service block has been constructed, it will not physically be able to accommodate many caravan/trailer dwellings. A larger, more suitable site should be found so that those living there can form a sense of community with fellow travellers rather than feel isolated within an area which is primarily fixed residential

I strongly recommend that Camden consult the traveller and gypsy community to identify more suitable areas for their proposed site, which would be a more appropriate, sustainable and inclusive solution which meets their needs.

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

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

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

☐

No

☒

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:

Camden has a duty to listen to its residents, who, after all pay the council tax. You therefore should listen to concerns voiced by local residents, including safety and security risks that this corner plot presents.

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:	Julia Chapman	Date:	24 th June 2025
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

From: MICHAEL LEVY
To: [PlanningPolicy](#)
Subject: Camden Local Plan – Proposed Submission Draft 2025 Representation Form
Date: 25 June 2025 21:12:26

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

Subject Ref: Camden Local Plan – Objections to Site C27

Deadline: 5 PM, Friday 27th June 2025

We, the undersigned homeowners, residents and leaseholders of the Primrose Hill/Belsize Park area, [redacted text], strongly object to the proposed designation of the land east of Constable House (Site C27) as a Gypsy and Traveller site under Camden Council's Local Plan.

Our objection is based on the following concerns:

1. Overcrowding and Inadequate Space

The proposed site is already surrounded by high-density housing and development. It is significantly smaller than the minimum recommended by Camden Council itself for such sites, raising serious concerns about the viability and safety of its use.

2. Lack of Green Space and Environmental Impact

The site currently provides one of the few remaining green buffer zones in the area. Repurposing it would reduce vital open space, impacting biodiversity and the wellbeing of all residents, particularly children and the elderly.

3. Transport and Infrastructure Strain

The site is adjacent to a busy main road, railway line, and near Chalk Farm tube station, all of which already experience high footfall and congestion. Adding a residential site would place additional pressure on local infrastructure and public transport.

4. Safety and Access Concerns

The proximity to the railway and road raises legitimate safety issues. Furthermore, the tight geography of the area could hinder emergency service access.

5. Impact on Local Community and Cohesion

While we support inclusive policies, sudden placement of a site without thorough consultation or integration plans can cause division, fear, or misunderstanding in the community. Camden must ensure adequate engagement and a more suitable location.

6. Planning Process Transparency

Residents were not sufficiently informed or consulted prior to this proposal. We request that future plans be made more transparently, with active participation from those directly affected.

We respectfully urge Camden Council to reconsider Site C27 for this use and instead explore alternative locations that are better suited in terms of size, infrastructure, safety, and integration capacity.

Signed,

Name	Address	Email address
Shreya Vora	[REDACTED]	[REDACTED]
Viraj Vora	[REDACTED]	[REDACTED]
Gita Ranabahu	[REDACTED]	[REDACTED]
Stefanie King	[REDACTED]	[REDACTED]
Brian King	[REDACTED]	[REDACTED]
Suzie Deyong	[REDACTED]	[REDACTED]
Ruth Fletcher	[REDACTED]	[REDACTED]
Michael Fletcher	[REDACTED]	[REDACTED]
Juliet Waller	[REDACTED]	[REDACTED]
Michael Levy	[REDACTED]	
Raymond Dinkin.	[REDACTED]	

Date: Wed, 25 Jun 2025 21:14:33 +0100
From: B Ross
To: [redacted], [redacted], [redacted], [redacted]
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

FAO: Camden Council Planning Policy Team

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

My name is Barry Ross and I live at [redacted address], London [redacted postcode] located near the proposed site.

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

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

1. Loss of Valued Community Amenity Space

The site is a long established, well used sports/ play area, with basketball court. There are very few apces in the area that allow young people to play sport so to remove this area from the residents of Constable House seems when we are trying to encourage our young people to get off their phones and play more sport, 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:

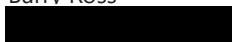
Chapter 4 Central Camden: Table 5 Chapter 7: Meeting Housing Needs: Policy H11Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

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

Kind regards,

--

Barry Ross



Date: Wed, 25 Jun 2025 20:21:05 +0000

From: N R

To: PlanningPolicy, Nasrine Djemai (Cllr), Kemi Atolagbe (Cllr), Rebecca Filer (Cllr)

Subject: Re: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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

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

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

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The site is a long-established, well-used sports/ play area, with basketball court. There are very few apces in the area that allow young people to play sport so to remove this area from the residents of Constable House seems when we are trying to encourage our young people to get off their phones and play more sport, 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
H11Draft 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,

N Ross

Responder 327

Date: Wed, 25 Jun 2025 20:22:56 +0000
From: Natalie Davidson
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 writing to you as a resident living near the above location. My details are:

Name: Natalie Davidson

[redacted]

email: [redacted email]

The following objection is as follows:

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 for objecting to this proposal are as follows:

1. The site is overlooked on all sides, but especially from Constable House and Eton Place. The new residential block currently under construction (5-[redacted address]) will also cause major overlooking problems.
2. It is a known fact that this area of Camden is prone to flooding - this is contrary to paragraph 13 of the Government Travellers Sites Planning Policy.
3. The site forms part of the outdoor play area for residents of Constable House. Surely funds would be better spent upgrading the play area and perhaps include some outdoor gym equipment which could be used by all local residents, not just residents of Constable House. There are problems with anti-social behaviour in this particular part of Camden, and upgrading the existing amenity space would really help all local residents.

It seems that the constraints of the gypsy and traveller site identification study do not seem to apply to this site, and therefore for the reasons listed above, the Camden Draft Plan should be modified by the deletion of site C27.

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

Kind regards

Natalie Davidson

Date: Wed, 25 Jun 2025 21:33:15 +0100
From: Nunes Borges
To: [redacted]
Subject: Objection to Site Allocation C27 – Camden Local Plan Proposed Submission Draft 2025

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

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

Dear Planning Policy Team,

Please find attached my completed representation form in response to the Camden Local Plan Proposed Submission Draft 2025.

I am submitting a formal objection to the proposed allocation of Site Reference C27 for Gypsy and Traveller accommodation. My representation addresses both legal compliance and the soundness of the plan, in accordance with the guidance provided by the Council. It outlines a number of significant concerns relating to public consultation, site suitability, infrastructure capacity, and policy justification, with specific reference to the Council's own Gypsy and Traveller Site Identification Study.

I respectfully request that Site C27 be removed from the Submission Draft in its entirety, and that the Council undertake a more robust and transparent assessment process involving full community participation before considering any future allocation of this site.

Please confirm receipt of this representation. I would be grateful if you could notify me of any future updates relating to the examination of the Local Plan and the Inspector's findings.

Yours faithfully,
Renata Mendonca Grabowsky Nunes
[redacted address], [redacted]
[redacted]

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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="Renata"/>	<input type="text"/>
Last Name	<input type="text" value="Mendonca Grabowsky Nunes"/>	<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: Renata Mendonca Grabowsky Nunes

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	Site Allocation C27 (Land off Chalk Farm Road, proposed for Gypsy and Traveller accommodation) H11	Policies Map	
-----------	--	--------	---	--------------	--

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

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

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

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

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

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

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

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

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

I object to the allocation of Site C27 on the basis that it is **not legally compliant, not sound**, and fails the **duty to co-operate**, as defined under the Planning and Compulsory Purchase Act and explained in the “Guidance on how to make a representation.”
A. Legal Compliance

The consultation process for Site C27 does not comply with Camden Council's Statement of Community Involvement. No in-person or drop-in events were held in the area. Residents were not physically notified, and no translated materials were made available for those who do not speak English, contrary to the borough's legal obligations to ensure inclusive and accessible community engagement. This procedural failure undermines the democratic legitimacy of the proposal.

B. Unsoundness

The allocation of Site C27 fails three key tests of soundness under the National Planning Policy Framework: it is not **justified**, **not effective**, and **not positively prepared**.

1. Not Justified

The GTSIS report acknowledges that all shortlisted sites, including C27, suffer from significant constraints. In the case of C27, these include:

- **Loss of playground and open space** used by existing families, which contradicts the Council's own local policies on protecting amenity land and open play areas, as well as London Plan Policy S4.
- **Flooding history** in the area, which was noted in the GTSIS through Camden's "Flood Streets" datasets and further corroborated by local experience, undermines suitability for long-term residential use.
- **Loss of privacy and increased exposure** due to the highly urban setting and proximity to existing residential properties. The site is directly overlooked by nearby buildings and footpaths, and mitigation is impractical. The GTSIS includes overlooking and privacy in its Suitability assessment, referencing the 18-metre separation rule from Camden Planning Guidance.
- **Lack of school capacity** in surrounding state schools, which raises serious concerns about social infrastructure deliverability and family integration, key elements of sustainable planning.
- **Increased footfall and exposure** due to the site's location adjacent to Chalk Farm Road and other high-traffic areas, which presents safety, noise, and social integration issues for prospective occupants.

2. Not Effective

The proposal does not meet the test of effectiveness for the following reasons:

- There is no evidence that waste, sewage, or service infrastructure can be appropriately provided or scaled in this area, which is already operating at high capacity.
- The area has been significantly impacted by the construction of HS2 and a major development underway near Chalk Farm Underground Station, which imposes ongoing disruption and limits the area's ability to absorb additional development.
- The allocation would result in loss of usable and valued community space and create land-use conflicts. This is explicitly discouraged in the GTSIS under Stage 4.3 (Achievability), which excludes sites that would cause a loss of amenity or community value.

3. Not Positively Prepared

The site is not deliverable without major mitigation on multiple fronts

(infrastructure, privacy, flood resilience, amenity loss), for which no plan or funding strategy is presented. The approach to including Site C27 in the draft appears to lack an evidence-led rationale and contradicts the planning principle of sustainable, inclusive development.

C. Failure of Duty to Co-operate

There is no indication of collaborative engagement with residents, community groups, or the wider Traveller community in determining the suitability of Site C27. The duty to co-operate requires demonstrable, strategic joint working, which is not evident in this case.

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.

To make the Camden Local Plan legally compliant and sound, Site Allocation C27 should be removed in its entirety from the Local Plan Proposed Submission Draft.

This modification is necessary to:

- Restore legal compliance by ensuring the Plan adheres to the Council's Statement of Community Involvement and equalities obligations;
- Align the Plan with the GTSIS evidence, which flags serious suitability and deliverability constraints for Site C27 including loss of playgrounds, flood risk, and overlooking/privacy;
- Ensure the Plan is justified, as C27 has not been demonstrated to be the most appropriate strategy when measured against other alternatives;
- Restore effectiveness, given that the infrastructure, social capacity and land use context of the area do not support implementation;
- Support positive preparation by avoiding allocation of a site that is neither deliverable nor sustainable under current conditions.

A revised approach should be undertaken after site-specific technical assessments and genuine community engagement are completed. If any Traveller sites are to be proposed in the area, they must be selected through a transparent, inclusive and evidence-based process.

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

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

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

☒

No

☐

Yes

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

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

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

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

Privacy Notice

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

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

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

11. Signature:

Date:

25/06/2025

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it 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 329

From: [REDACTED]
To: [REDACTED]
Subject: Gypsy and traveller site in Chalk Farm
Date: 25 June 2025 21:44:18

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.

Dear planning team,

I'm writing to object to the proposal to use the land east of Constable House in Chalk Farm for a gypsy and traveller site.

The area by Chalk Farm station is extremely busy and heavily trafficked. Creating new entrances will impact pedestrians and potentially sacrifice precious green space. Adelaide Road also poses a flood risk.

Kindly reconsider this location as it is not suitable for this purpose.

Regards

Katherine Bellau

From: [REDACTED]
To: [REDACTED]
Cc:
Subject: Opposition to recycling center relocation on Holmes Road
Date: 25 June 2025 21:46:19

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.

Dear Camden Planning Policy Team,

I am writing to provide comments on the draft Local Plan currently under consultation, specifically in relation to the proposed redevelopment of the Regis Road site in Kentish Town.

While there are several commendable aspects to the overall plan, I am very concerned by the recent proposal, introduced in the March update, to locate the recycling centre on the portion of the current police station site closest to Holmes Road. This site borders residential properties and sits directly opposite St Patrick's School. This appears to be a significant change from earlier versions of the plan and, worryingly, was not subject to the same level of public consultation. Like many nearby residents, we only became aware of this shift in the past few days.

After reviewing the draft document, I believe it would be far more appropriate to situate the recycling centre within the designated commercial or light industrial areas of the site — ideally further north, closer to the Murphy's Yard or railway land — and away from residential homes and schools.

Introducing a recycling centre so close to homes and a primary school will only intensify these issues — bringing increased noise, disruption, and air pollution. Many users of the current centre leave engines idling during visits, and this would pose a clear risk to air quality in a location already intended to benefit from Healthy School Streets and traffic reduction measures.

If Camden is genuinely committed to enhancing Holmes Road and the surrounding area as a welcoming and vibrant part of the borough, placing a recycling centre in close proximity to homes and a school is entirely counterproductive.

There is an important opportunity here to create a well-designed, community-friendly neighbourhood. I urge the Council to rethink this particular element of the plan in light of its long-term impact on residents and local services.

Best regards

Emmanuel Vivant

[REDACTED]

[REDACTED]

Responder 331

Date: Wed, 25 Jun 2025 21:08:09 +0000
From: Julia Chapman
To: PlanningPolicy
Subject: Fwd: ARTA Objection to site allocation C27

>
>

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 and Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Nigel and Lucina"/>	<input type="text"/>
Last Name	<input type="text" value="Chapman"/>	<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" 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:

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

C27

Policies Map

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

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

*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.

In my view the allocation of a traveller site adjacent to Constable House on Adelaide Road is unsound and should be removed because:

1. Loss of a valuable amenity for the community.

This is an important green space much needed in an inner city area.

It is used by the local residents and schoolchildren.

It is directly adjacent to Constable house and due to its immediate vicinity parents can supervise their children playing. This space is particularly valuable in a densely populated area where there are not many open green spaces available to residents, particularly with HS2, where the works have removed mature trees already. This site has many mature trees which are important.. To

develop this would be contrary to a number of requirements in both the London plan policy and the Camden Local plan policy in regards to reducing the quality and variety of local amenities eg NPPF paragraphs 99-101

Camden Local plan Policy A2(e)

London Plan Policy S4

There is legal precedent in *Copas v Royal Borough of Windsor and Maidenhead* (2001) EWHC Admin 548 confirming that local informal community used land requires policy-compliant justification before loss. This plan has not been widely publicised by Camden for real formal consultation.

2. This area is at risk of flooding

The proposed site is contained within the Local flood risk zone and traveller accommodation is considered a 'highly vulnerable' use under planning practice Guidance

This is contrary to

NPPF para 167

PPTS para 13 (g)

See APP/B5480/A11/2151483(Romford) for precedent

3. Overlooking and privacy,

The proposed site is within a very urban area already and is already overlooked by the multi storey residential blocks of Constable house and those on Eaton College Road. There is a massive new development currently being built adjacent to Chalk Farm Station, which will also overlook this site. This new site will undermine privacy for local residents and also potential traveller occupants

This contravenes

Camden planning guidance on amenity

PPTS (2023) para 13 ©

Article 8 of the ECHR

Supported by *Moore vs SSCLG* (2013) EWCA Civ 1194

4. There are significant access issues on this small heavily trafficked corner plot

This site is on a corner, it is a main road and heavily trafficked,. This has been made worse by HS2 works and lorries. Although the HS2 work is being paused, it will start again and take decades to complete, and this will mean that potential residents in trailer accommodation which does not have the soundproofing and insulation of modern homes, will be subject to noise and pollution. It is across from a railway, this choice of site is not a respectful place for travellers to live. There is also no independent access for large vehicles to the site for trailers, lorries and emergency vehicles. Estate roads cannot accommodate safely the size of vehicles that would need to use them to access this potential site.

This conflicts with

PPTS para 13 b

Manual for streets DfT 2007

Equality Act 2010

There could be potential safety risks and security risks.

5. Visual impact

This is a valuable local green area, to build on it, and allocate its use to the travelling community will have a significant visual impact. I have seen other traveller sites and they have a significant visual impact, with lorries, trailers, cars and equipment, which is completely out of keeping with this area.

6. Size

This is a very small site and once the service block has been constructed, it will not physically be able to accommodate many caravan/trailer dwellings. A larger, more suitable site should be found so that those living there can form a sense of community with fellow travellers rather than feel isolated within an area which is primarily fixed residential

In our view, this proposition is unsound and should be removed on the basis of the above points.

We strongly recommend that Camden consult the local community in an open and meaningful way (this has not been locally publicised) and the traveller and gypsy community , who are a marginalised section of society to identify more suitable areas for their proposed site, in order to find a more appropriate, sustainable and inclusive solution which meets their needs.

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

☐

No

☒

Yes

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

Camden has a duty to listen to its tax paying residents, and listen to their concerns including safety and security risks that this corner plot presents. It is wholly unsuitable for consideration as a traveller and gypsy site.

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.

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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:	Nigel and Lucina Chapman	Date:	24th June 2025
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Notes to accompany the Representation Form

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- 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.

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- 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 332

Date: Wed, 25 Jun 2025 22:30:51 +0100

From: Hannah Marie Gatt

To: [redacted]

Subject: Concerns about plans to move recycling centre to Holmes Road

I'm writing to voice my concerns about the proposal to move the regis road recycling centre to Holmes road, opposite St Patrick's school in Kentish town. I'm concerned that the added pollution and traffic puts the children of st Patrick's at risk.

An industrial recycling facility belongs on an industrial site, like the one on Regis Road.

Like a lot of residents of Kentish town, I am concerned that little no public consultation has been taken in regards to this.

I would gratefully appreciate any information in regards to the proposal, and what myself and other residents can do to appeal this decision..

Thanks

Hannah Gatt

[Redacted signature]

Responder 333

Date: Wed, 25 Jun 2025 22:35:12 +0100

From: Victor Borges

To: [redacted]

Subject: Objection to Site Allocation C27 – Camden Local Plan Proposed
Submission Draft 2025

[redacted]

Best regards,
Victor Borges

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="Victor"/>	<input type="text"/>
Last Name	<input type="text" value="Britto Borges"/>	<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: Victor Britto Borges

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	Site Allocation C27 (Land off Chalk Farm Road, proposed for Gypsy and Traveller accommodation) H11	Policies Map	
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

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

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

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

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

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

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

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

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

I am strongly opposed to the inclusion of **Site Allocation C27** within the Camden Local Plan Proposed Submission Draft, as I believe the process has fallen short of legal requirements and the proposed allocation is fundamentally unsound.
Lack of Legal Compliance

There has been a clear failure to engage the local community in a manner consistent with Camden Council's own Statement of Community Involvement. No face-to-face consultation events were organised in the area affected, and residents did not receive any letters or leaflets regarding this proposal. Furthermore, all materials were issued exclusively in English, overlooking the linguistic diversity of our community and thereby excluding many from participating. This lack of inclusive and accessible communication renders the consultation process procedurally inadequate.

Unsoundness of the Plan

The plan also fails the key tests of soundness as defined by the National Planning Policy Framework:

- **Not Justified:** The allocation of Site C27 is not supported by robust or proportionate evidence. The area is already extremely built-up and undergoing significant disruption due to major development projects, including near Chalk Farm Station and the ongoing HS2 works. Moreover, the site is ill-suited for use as residential Traveller accommodation due to issues such as previous flooding, loss of existing children's play facilities, and tight spatial constraints. These are all flagged as relevant considerations within Camden's own Gypsy and Traveller Site Identification Study (GTSIS, 2024).
- **Not Effective:** It is highly doubtful that the site could be delivered successfully. The infrastructure is already under strain, and there are valid concerns over how waste, drainage, and sewage would be managed. The surrounding state schools are at capacity, so it is not clear how the educational needs of future occupants would be met. The proposal would also reduce available outdoor space used by current families, harming the liveability of the estate.
- **Not Positively Prepared:** The site is neither available nor realistically viable within the plan period, and no attempt has been made to engage transparently with the community or resolve the practical limitations of the site. The use of this location for such a purpose appears forced, lacking in both long-term vision and fairness to current or future residents.

Duty to Co-operate

There is no evidence of meaningful collaboration with local residents, Traveller communities, or cross-borough partners in the formulation of this allocation. The absence of cooperative working undermines the Plan's integrity and fails to meet the statutory expectations placed on Camden Council.

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.

In order to ensure the Plan is lawful and meets the standards of soundness, I urge the Council to **remove Site Allocation C27 entirely** from the Local Plan. This step is necessary because:

- The site selection process did not adhere to the minimum consultation standards required by the council's policy and national regulations.
- The constraints identified in the Gypsy and Traveller Site Identification Study — including loss of children's play space, privacy issues, flooding risk, and surrounding density — were not properly resolved before inclusion.
- The location is not deliverable in any practical sense and presents conflicts with adjacent land uses and local infrastructure that would require extensive intervention and expenditure to overcome.

The site should only be reconsidered following a transparent and inclusive assessment process, supported by detailed feasibility studies and genuine engagement with those affected.

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

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☒ No

☐ Yes

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11. Signature:		Date:	25/06/2025
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Responder 334

Date: Wed, 25 Jun 2025 22:27:12 +0000
From: Beverly Barnett
To: planningpolicy@camden.gov.uk
Subject: Opposing Planning permission for Gypsies to use land between Eton College Road and Adelaide Road NW3

[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.

Attn: Planning Officer

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Yours Sincerely
Beverly Barnett
Sent from my iPhone

Respondent 335

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Site 1016 - Land east of Constable House, NW3 3QA - Gypsy - Traveller development
Date: 25 June 2025 23:58:07
Attachments: [image.png](#)
[image.png](#)

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.

Dear Camden Council

[REDACTED] and I am registering my concerns on the above proposed land use. I believe the proposed traveller site will harm the area and prove unsuitable for Travellers.

Over capacity

The end of Eton Road has a large number of flats - and with an additional block of flats under construction



1. Constable House
2. Constable House
3. Eton Villas
4. Eton Villas

5. Eton Villas
6. Under construction - Best Star Real Estate

Eton Villas consist of 3 large roughly "H" shaped 7 story blocks of flats. In all there are thousands of residents in the area less than 100 metres away from the site.

Loss of Green space



There are a number of well established trees which are irreplaceable. They provide the only nearby place for the many residents to relax and connect with nature. The trees also provide sound proofing from the busy Adelaide Road.

Loss of privacy

the space is adjacent to Constable house and only approximately 10 metres from the land.

Increase of Traffic and congestion

Adelaide road is already very busy. The land is on an extremely busy corner - busy with cars and pedestrian footfall. Chalk farm station is very close by and is heavily used by residents and concert goers to the Round House.

HS2

HS2 has impacted Adelaide road for the last 14 years and looks to be affecting the area for an additional 10 years recently announced by the government. Losing the open space

would just compound the congestion, temporary traffic lights, loss of lanes etc.

Flood risk

The land is a known flood risk so not suitable for change of use. The existing greenery goes some way to mitigating this. Losing the greenery would just compound the flood problem.

Can you provide more information on the proposed usage. I would like a public meeting to openly debate residents' concerns along with the views of the council.

Yours Faithfully

Simon & Maria Sullivan



Date: Wed, 25 Jun 2025 23:06:36 +0000
From: Alexander Taryshkin
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan: Objections to Site C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)

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

Name: Alexander Taryshkin

[Redacted address]

Email address: [redacted email]

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

Site C27 should be deleted from the following:

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

The reasons for my objection:

This small space has great value for those of us living nearby, not just visually, but socially and practically. Several key concerns make this location unsuitable for such an allocation:

- Footfall and exposure: The plot is right next to Chalk Farm station and sits along the busy walking route to Primrose Hill, one of the most heavily used pedestrian corridors in the area. It's already a high-traffic zone, with very little calm or protection from noise and movement.
- Loss of privacy for residents/future occupants: The site is directly overlooked by numerous residential buildings, including Constable House (4-5 storeys), the Etons (6 storeys), Provost Road houses, Primrose House, Bridge House, and the new block on Haverstock Hill. The location offers no seclusion or quiet. Any families placed here would live in full view of hundreds of windows, next to a busy road, a railway line, and a major pedestrian route. It would not provide a safe, private or dignified living space.
- Loss of green space: This is one of the last small green areas in our immediate neighborhood. Its removal would take away a calm, natural space in an already built-up and densely populated environment.
- Community planting: Over the last few months, fruit trees and wildflowers were planted here as part of the CommuniTrees project, supported by local young people. The proposed site would wipe out this initiative entirely, which feels like a step backwards for community life and local engagement.
- Playground space: The site is used by children from Constable House and neighboring homes as an informal but essential play area. There is no obvious alternative nearby. Removing this space would take away one of the few places where local children can safely play outdoors.
- Access issues: The proposed access to the site would be directly opposite to buildings, raising serious concerns about traffic flow and disruption for both

residents and any future occupants of the site. The plot is hemmed in by narrow roads and pedestrian areas, with limited turning space-posing challenges for critical emergency service vehicles.

- Flooding history: The area has recently experienced repeated flooding, especially around the play area. Developing this ground would risk further complications for both the site and surrounding buildings.
- No clear planning for school places: There is no information indicating whether any consideration has been given to nearby school capacity or access to essential local services.
- No Consultation: There has been no meaningful consultation with local residents regarding the proposed use of this site.

Conclusion

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

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

Regards,
Alexander Taryshkin

Date: Thu, 26 Jun 2025 00:33:34 +0100
From: Joshua Cavendish
To: [redacted]
Subject: Camden Local Plan | Objections to Site C27 (Gypsy and Traveller Site)

Personal Details

Joshua Cavendish



[redacted email]

+++

Dear Sir/Madam,

I am writing to formally **object** to the proposed allocation of land adjacent to *Constable House, Adelaide Road*, close to Chalk Farm tube station, as a permanent Gypsy and Traveller site under Camden's Local Plan.

1. Strategic Under-Provision & Site Selection Concerns

- The proposal only addresses **six pitches** across two borough sites-four at Freight Lane (King's Cross) and two here ([fitzrovia.com](https://www.fitzrovia.com), [gamesmonitor.org.uk](https://www.gamesmonitor.org.uk))-falling far short of the identified need of sixteen pitches.
- Community advocates from Camden's Traveller community have expressed strong concern regarding the **lack of genuine search and selection processes** for suitable sites ([fitzrovia.com](https://www.fitzrovia.com)), indicating the choice appears driven by land availability rather than informed, inclusive planning.

2. Incompatible Urban Context & Transport Pressures

- The proximity to Chalk Farm underground station and high density urban developments means the site risks exacerbating **traffic congestion**, increasing noise pollution, and compromising pedestrian safety.
- There is **no evidence** of a Traffic or Transport Impact Assessment supporting this location's suitability amid heavy pedestrian and vehicular flows.

3. Insufficient Infrastructure & Amenity Provisions

- No commitment has been made to essential infrastructure upgrades-such as utilities, drainage, waste management or secure hard-standing-raising the risk of inadequate living conditions or negative impact on neighbouring residential blocks.

4. Inadequate Community Consultation & Policy Transparency

- Camden Council's method of site identification did not sufficiently involve local residents or Traveller community members in a transparent dialogue for this location .
- The absence of a published, formal **pitch allocation policy**, despite being flagged as in development, means the proposal lacks the necessary policy framework to ensure equitable, sound decision making ([fitzrovia.com](https://www.fitzrovia.com)).

5. Risk of Incremental Expansion & Precedent Concerns

- Refusing thorough environmental and Green Belt impact assessments risks allowing **incremental growth**, leading to densification beyond the stated two pitches-an outcome

communities have repeatedly encountered in other boroughs (insidehousing.co.uk).

- For example, Argyle Traveller sites in other London boroughs have repeatedly faced expansion after initial "small" allocations.
- National authorities, including the Secretary of State, have blocked similar sites in green belt and open space areas on grounds of openness loss and lack of very special circumstances (insidehousing.co.uk).

6. Conflict with Planning Policy & Soundness Requirements

- Camden's Local Plan and the NPPF require that Traveller site allocations must not compromise **safety, amenity, service provision, or environmental integrity**-all of which are demonstrably at risk here absent a proper assessment.
- The sudden addition of the site, without robust evidence or planning justification, places the plan at risk of **not being 'sound'** under legal scrutiny.

Request for Action

In light of the above, I urge Camden Council to:

1. **Withdraw** the Constable House/Adelaide Road site from the Local Plan.
2. **Publish a formal Traveller Pitch Allocation Policy**, aligned with Camden's 10-year need.
3. **Engage meaningfully with both the Traveller community and residents**, collaboratively identifying sites that are equitable, sustainable, and supported by planning evidence.
4. Undertake comprehensive assessments (transport, utilities, environment) and follow transparent decision-making protocols.

Thank you for considering my objection. I am available to discuss further or propose alternative sites that meet both local housing needs and urban planning standards.

Yours faithfully,

Joshua Z Cavendish



Date: Thu, 26 Jun 2025 05:49:04 +0000
From: barney starling
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 contacting you to object to **C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller site)**

- Name: Barney Starling
- Address: [redacted address], [redacted]
- Telephone number: [redacted]

GROUND'S FOR OBJECTION

Amenity Land Linked to Residential Housing

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

Designated Green/Open Space - Ecological and Community Value

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

Play Area Use

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

Overlooking and Loss of Privacy

The site is overlooked from all directions:

- East: Constable House (4-5 storeys)

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

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

Flood Risk

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

Access and Infrastructure Concerns

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

Educational Provision

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

Failure to Apply Constraints from Site Assessment Criteria

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

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

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

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

4. Implement flood prevention and sustainable drainage systems

Lack of Public Consultation

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

Conclusion

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

I, Barney Starling, wish to appear and make representations at the examination hearings into the Draft Local Plan before the appointed Planning Inspector.

Responder 339

Date: Thu, 26 Jun 2025 07:05:19 +0100

From: Mihai Ciobanu

To: [redacted]

Subject: Camden local plan: objections to site C27 (Gypsy and Traveller 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.

Good morning

[redacted]

[redacted]

[redacted]

[redacted]

Thank you

Mihai

[redacted address], [redacted]

[redacted postcode]

Responder 340

Date: Thu, 26 Jun 2025 06:41:15 +0000
From: Oisin Patterson
To: planningpolicy@camden.gov.uk
Subject: Planning Policy for Basements

Patterson Construction



**Please consider the environment before printing
this email**

This message is intended only for the named recipient(s) and may contain confidential information. If you are not the intended recipient, any review, distribution, or copying is prohibited. Please notify us immediately if you received this in error and delete the message

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="Oisín"/>	<input type="text"/>
Last Name	<input type="text" value="Patterson"/>	<input type="text"/>
Job Title	<input type="text" value=""/>	<input type="text"/>
Organisation	<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"/>

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: Patterson Construction Ltd

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

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – Draft new Local Plan - Camden Council
- Draft Policy Map - Draft new Local Plan - Camden Council

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

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

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

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

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

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="Yes"/>
(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="Yes"/>
(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="Yes"/>
(4) Consistent with national policy	<input type="text" value="Yes"/>

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

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

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

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

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

I would like to add that our company employs 40 people who work in the sector.

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

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

(Continue on a separate sheet if necessary)

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

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

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

(Continue on a separate sheet if necessary)

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

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

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

No

No

Yes

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

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

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

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

Privacy Notice

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

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

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

11. Signature:		Date:	26 th June 2025
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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 341

Date: Thu, 26 Jun 2025 07:52:48 +0100
From: Lucy Cottrell
To: [redacted]
Subject: Site 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.

This seems a most unsuitable small site and would be highly intrusive for the people living right by in Constable House and, on this basis, I want to register my objection.

From: [REDACTED]
To: [REDACTED]
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)
Date: 26 June 2025 08:00:12

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.

My name is Opinca Andriana and I live in [REDACTED] located near the proposed site.

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

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

1. Loss of Valued Community Amenity Space

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

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

2. Overlooking and Loss of Privacy

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

5. Unsound Site Selection Process and Lack of Transparency

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

However:

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

- Chapter 4 Central Camden: Table 5

- Chapter 7: Meeting Housing Needs: Policy H11

-Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

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

Kind regards,

Andriana

Date: Thu, 26 Jun 2025 07:10:05 +0000
From: Planning
To: PlanningPolicy
Subject: FW: Allocation of Site C27

Dear Planning,
I am writing, as [redacted], to object strongly to this section of the Camden Local Plan. I attach my formal objection.

You need to be aware of the sensitivity of the site you are proposing as a Gypsy and Travellers Site. It is immediately opposite Bridge Approach and Chalk Farm Bridge. The entire population of Primrose Hill Village uses the zebra crossing over Adelaide Road on their way to Chalk Farm Tube Station on a very frequent, often twice daily, basis. This zebra crossing is extremely close to Site 27. The establishment of a Gypsy or Traveller Site near the zebra crossing would detract significantly from the amenity of what is otherwise a pleasant walk.

Primrose Hill also attracts very large numbers of visitors, mainly arriving and departing via Chalk Farm Tube Station. The experience of their visit will be negatively impacted by the proximity of a Gypsy or Traveller Site immediately next to the zebra crossing across Adelaide Road.

Despite the vital importance of the link between Primrose Hill Village and Chalk Farm Tube Station to the population of the former, I have only become aware of this proposal in the last few days. I consider this to be very inadequate consultation on such an important issue.

Because of the unfortunately short interval between my discovery of the plan and the date for the closure of the consultation, my formal response is limited to a very strong endorsement of the excellent response of the Adelaide Road Tenants Association.

Yours faithfully,
Martin Sheppard
Chairman The Gloucester Avenue Association

--

Martin Sheppard

[redacted address]
[redacted]
[redacted]

[\[redacted email\]](#)

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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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="Martin"/>	<input type="text"/>
Last Name	<input type="text" value="Sheppard"/>	<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" value=""/>	<input type="text"/>
E-mail Address	<input type="text" value=""/>	<input type="text"/>

Part B – Please use a separate page for each representation

The Gloucester Avenue Association

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

- | | | | | |
|--|-----|--------------------------------|----|--------------------------------|
| (1) Legally compliant | Yes | <input 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.

Dear Planning Policy Team,

I write on behalf of the [REDACTED] to object formally to the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). 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. Although other garden areas exist across the estate, this site is directly adjacent to Constable House and is particularly accessible and visible to its residents. It supports incidental play, passive recreation, and social use, especially for families living in high-density accommodation.

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

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

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

2. Overlooking and Harm to Privacy - Amenity Impact

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

This contravenes:

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

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

3. Flood Risk - Inappropriate for Highly Vulnerable Use

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

Contrary to:

- NPPF Paragraph 167;
- PPTS para. 13(g).

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

4. Access and Deliverability - Physical and Functional Constraints

There is no independent vehicular access. Estate roads cannot accommodate trailers, service, or emergency vehicles.

Conflicts with:

- PPTS para. 13(b);
- Manual for Streets (DfT, 2007);
- Equality Act 2010.

5. Conclusion and Recommendation

The proposed allocation is unsound and should be removed on the basis of:

- Loss of valued amenity space;

- Overlooking and privacy conflicts;
- Unacceptable flood risk;
- Lack of deliverability.

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

Yours faithfully,

The Gloucester Avenue Association

(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	<input checked="" type="checkbox"/>
(b) when the Inspector's Report is published	<input checked="" type="checkbox"/>
(c) when the Camden Local Plan is adopted	<input checked="" type="checkbox"/>

Privacy Notice

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

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

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

11. Signature:	Martin Sheppard	Date:	24 June 2025
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

Responder 344

Date: Thu, 26 Jun 2025 07:11:41 +0000
From: James Dawson
To: PlanningPolicy
Subject: Nature corridor C1 paragraph 19

I am keen to support the nature corridor outlined in the priority infrastructure draft for Camden Local plan. We need nature as well as housing development. Where it's done thoughtfully with enough resource then it can be very successful and bring nature into cities for us all to benefit from.

Best wishes
James

Camden resident
[redacted address]
[redacted] [redacted postcode]

[redacted]
[redacted]
[redacted]

Date: Thu, 26 Jun 2025 08:29:23 +0100
From: Sonia Hanson
To: [redacted], [redacted], [redacted], [redacted]
Subject: Re: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

On 25 Jun 2025, at 22:41, Sonia Hanson <[redacted email]> wrote:

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

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

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

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.

Date: Thu, 26 Jun 2025 07:38:04 +0000

From: Ranjit Singh

To: PlanningPolicy

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Eton College Road/Adelaide Road

I am shocked and disappointed by the proposal to place a Gypsy and Traveller site in such a small and constricted space. The space has recently undergone a much loved greening initiative. Moreover, we as residents are already inundated with tourists day tripping to Primrose Hill from Chalk Farm together with the overspill of those visiting Camden Lock and The Roundhouse. An encampment will have a further diminishment of the quality of life for me and my fellow local residents.

I would respectfully ask you to consider the following:

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,

Name: Raniit Singh

[Redacted Signature]

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

Date: Thu, 26 Jun 2025 07:59:54 +0000

From: Steve Gadd

To: PlanningPolicy

Subject: Gypsy & Traveller Site - Flat 116 Eton Hall, Eton College Road, [redacted postcode]

I 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)

The site is a long-established, well-used informal green space historically utilised as an open 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.

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.

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.

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.

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.

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.

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).


Responder 348

Date: Thu, 26 Jun 2025 08:00:00 +0000
From: avemaria okonkwo
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan:objections to site C27-Land East of Constable House
,Adelaide Rd (gypsy and traveller site)

Please receive Representation form

Regards

Ms Ave Maria Nwandison

A large black rectangular redaction box covers the signature and any accompanying text or contact information.

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="Ave-Maria"/>	<input type="text"/>
Last Name	<input type="text" value="Nwandison"/>	<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" value="REDACTED"/>	<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:

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

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

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

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

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

- | | |
|---|--------------------------------|
| (1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements) | <input type="text" 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.

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

Objection based on legal compliance:

I hereby formally object to the inclusion of the proposed Traveller site allocation at Land East of Constable House, NW33QA, within Camden council's Proposed Submission Draft Local Plan, on the basis that it does

not comply with the legal requirements set out in the council's Statement of Community Involvement (SCI).

The consultation concerning this proposed site failed to satisfy the legal standards and principles of proper community engagement as set out in the SCI:

- No face-to-face meetings or drop-in sessions were arranged for the residents of Constable House or those living nearby, despite the proposal having a significant and direct effect on their homes and local surroundings.
- There were no physical notices (like letters, flyers, or posters) sent to inform residents that the area next to their homes was being considered for Traveller accommodation. As a result, many residents were unaware of the proposal until they heard about it from neighbours.
- Information was not provided in languages other than English, even though a large number of Constable House residents either don't speak English or have it as a second language. This oversight excluded vulnerable and underrepresented communities from participating in the consultation, contradicting Camden's commitment to inclusivity.

These shortcomings constitute a violation of the Council's legal obligation to conduct a consultation that is "visible, accessible, inclusive, and transparent," as required by both its SCI and national planning regulations (Town and Country Planning (Local Planning) (England) Regulations 2012).

As a result, this section of the Plan has not been lawfully developed. I respectfully urge that the site allocation be withdrawn or paused until a proper, targeted, and accessible consultation has been conducted with the affected community.

Objection on Grounds of Unsuitability:

I wish to raise an objection to site allocation C27, arguing that it is fundamentally unsound.

The proposed allocation of Traveller pitches at Land East of Constable House is flawed due to the Camden Local Plan not being positively prepared. This site cannot realistically meet the borough's identified need for Traveller accommodation. Its small size, restricted access, and location next to densely populated residential areas make it wholly unsuitable, even for a limited number of pitches. Additionally, significant public opposition is expected, further complicating the delivery of this site. Therefore, it does not represent a viable or practical option for meeting Camden's housing targets.

The plan lacks justification, as there is no solid or balanced evidence backing the choice of this site. Camden has not supplied the necessary technical assessments or supporting documentation to prove that the site is appropriate or feasible. There seems to be no thorough evaluation of factors such as flood risk, accessibility, or its closeness to existing homes, and no clear explanation as to why this site was preferred over others.

In conclusion, the allocation is not practical, as the site is unlikely to be realised. Its physical limitations - such as its small footprint, awkward layout, and location on green space with limited road access - create substantial barriers to development. Furthermore, the lack of community backing, coupled with significant public opposition, will make obtaining planning permission extremely difficult, if not impossible. Without a clear and viable plan for delivery, this part of the Plan does not meet the effectiveness requirement.

(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 site allocation at Land East of Constable House (C27) (NW3 3QA) should be removed from the Plan. It is unsuitable due to its limited size, restricted access, and the significant challenges posed by local opposition and practical limitations, which make it unlikely to be delivered.

Camden should review other potential sites using a clear, evidence-based approach and make the results available for public review. Any future site allocations must be supported by robust technical evidence, practical delivery strategies, and thorough consultation with both the Traveller community and local residents. This will ensure the Plan is well-prepared, justified, and effective, aligning with national planning policy.

(Continue on a separate sheet if necessary)

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

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

☒ No

☐ Yes

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

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

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

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

Privacy Notice

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

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

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

11. Signature:	Ms A Nwandison	Date:	25/6/25
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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.

Date: Wed, 25 Jun 2025 15:41:28 +0100

From: Alex Stockler

To: [redacted]

Subject: Representations regarding site allocation C27 in Camden Local Plan

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

[redacted]
[redacted email]

Dear Camden Council Policy Planning Team:

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

This small space has great value for those living nearby, not just visually, but socially and practically. Several key concerns make this location unsuitable for such an allocation:

- Footfall and exposure: The plot is right next to Chalk Farm station and sits along the busy walking route to Primrose Hill, one of the most heavily used pedestrian corridors in the area. It's already a high-traffic zone, with very little calm or protection from noise and movement.
- Loss of privacy for residents/future occupants: The site is directly overlooked by numerous residential buildings, including Constable House (4-5 storeys), the Etons (6 storeys), Provost Road houses, Primrose House, Bridge House, and the new block on Haverstock Hill. The location offers no seclusion or quiet. Any families placed here would live in full view of hundreds of windows, next to a busy road, a railway line, and a major pedestrian route. It would not provide a safe, private or dignified living space.
- Loss of green space: This is one of the last small green areas in our immediate neighborhood. Its removal would take away a calm, natural space in an already built-up and densely populated environment.
- Community planting: Over the last few months, fruit trees and wildflowers were planted here as part of the CommuniTrees project, supported by local young people. The proposed site would wipe out this initiative entirely, which feels like a step backwards for community life and local engagement.
- Playground space: The site is used by children from Constable House and neighboring homes as an informal but essential play area. There is no obvious alternative nearby. Removing this space would take away one of the few places where local children can safely play outdoors.
- Access issues: The proposed access to the site would be directly opposite to buildings, raising serious concerns about traffic flow and disruption for both residents and any future occupants of the site. The plot is hemmed in by narrow roads and pedestrian areas, with limited turning space-posing challenges for critical emergency service vehicles.
- Flooding history: The area has recently experienced repeated flooding, especially around the play area. Developing this ground would risk further complications for both the site and surrounding buildings.

- No clear planning for school places: There is no information indicating whether any consideration has been given to nearby school capacity or access to essential local services.
- No provision for increased policing in line with increased population.
- No Consultation: There has been no meaningful consultation with local residents regarding the proposed use of this site.

Conclusion

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

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

Thank you for your time and consideration,
Alexander Stockler

Sent with [Spark](#)

From: [REDACTED]
To: [REDACTED]
Cc:
Subject: Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). Policy H11, pages 294-5
Date: 26 June 2025 09:14:00

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.

Dear Sir/Madam

Re

Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). Policy H11, pages 294-5

I strongly object to this section of the Camden Local Plan. If passed it would severely limit quality of life in Primrose Hill. [REDACTED]

[REDACTED]
The safety of the route is extremely important and I suspect that we would end up using the tube far less and that we would end up severely reducing our travel in London. This would be a severe reduction in the quality of life for all of us who enjoy living in Primrose Hill.

I am surprised by the very short notice we have received and cannot believe that there has been adequate consultation.

Please keep me informed of developments.

Yours

Greg Hodder
[REDACTED]
[REDACTED]

Responder 351

Date: Thu, 26 Jun 2025 08:30:41 +0000
From: Michael Wiseman
To: PlanningPolicy
Subject: Camden Local Plan Objection

Representation by the Association of Specialist Underpinning Contractors (ASUC)
in support of submitted Response Form for Camden Local Plan – Proposed
Submission Draft 2025

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Section 1. Introduction

1. We are responding primarily to elements of the Local Plan which relate to basement development, policy D6.
2. We are generally supportive of the proposed plan and policies and there are some notably useful aspects within the policy given the particular problems that basement development has had in the borough prior to the adoption of the 2017 basement policy. However the proposed plan and policy has significant flaws in the limitation it seeks to introduce around the siting, location, scale and design of basements.
3. Notable of these are the limitations for basement developments to
 - a. Not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement.¹ In plain English this is a ban on basements underneath existing gardens.
 - b. Be set back from the neighbouring property boundaries where a new access or lightwell is being created.²
4. These limitations are
 - a. demonstrably arbitrary; and/or
 - b. unsupported by any proper or proportionate evidence / the Council's own evidence; and/or
 - c. imposed in defiance of logic; and/or
 - d. impose greater burdens on developers of basements than would be imposed on developers above ground without good reason; and/or
 - e. Ignore the opportunity for positively prepared policy to drive benefits
5. Separately the limitation to a single storey of additional basement³ is considered unsound. However, since it was adopted in Camden's 2017 basement policy we do not focus on it at this time other than to ask that our position is noted that the policy is unsound on the same basis as we have given in paragraph 4 above. We reserve our position to object to this limitation when future Local Plans are developed depending on the evidence put forward at that time.
6. The Council has included a requirement specific to basements in relation to carbon⁴. We have clarified with the Council that this requirement does not seek to limit basement

¹ Policy D6. Paragraph C. 3.

² Policy D6. Paragraph C. 4.

³ Policy D6. Paragraph C. 1. Not comprise of more than one storey.

⁴ Policy D6. Paragraph E. 3 which states that applicants have to demonstrate that they have sought to reduce the embodied carbon of the basement. The Council will request the applicant to provide data showing the upfront embodied carbon of the basement proposal.

development⁵ and ask that the Council's confirmation that carbon is not being used to limit basement development is noted.

7. A policy that allows garden basements could justifiably require improvements over the pre-development situation in matters including green / garden spaces and trees, biodiversity, and, in most cases, drainage and surface water run-off⁶.
8. These improvements could be implemented by the inclusion of appropriate pre-start planning conditions:
 - a. Green / garden space and trees – the condition could require a landscaping design that promotes natural, bucolic appearance with wild flowers and natural planting being required. Trees of amenity value are already protected. The landscaping design could require the planting of additional semi-mature trees where appropriate. The one metre of soil already required over the roof of a garden basement allows the healthy planting and growth of a tree of any size, there is no limitation to tree size or planting from the existence of a garden basement ("Appendix A")⁷.
 - b. Biodiversity – a Biodiversity Net Gains (BNG) plan could go hand in hand with the landscaping plan. "Indeed, if prior to construction a garden were to be of limited ecological value and a wildlife friendly landscaping scheme was implemented, the proposals are likely to result in a net biodiversity gain"("Appendix B")⁸.
 - c. Drainage and run-off of surface water – an improvement over the existing condition can be achieved by good design in most cases through Sustainable Urban Drainage Systems (SuDS) or an enhanced SuDS. In general SuDS works by capturing and holding water run-off during and after rainfall, to be released with a reduced flow rate over a longer period of time. This would cause an improvement compared to the original situation with regards to flooding.
9. Where the policy can require an improvement then we submit that the new policy should, unless there are demonstrable reasons against, take the opportunity to do so. Basements beyond the footprint of the existing footprint, garden basements, are such an opportunity. The Council has not presented any good reasons for the ban on garden

⁵ Council's response to Basement Force Ltd Question Set 3, Question 2 dated 12 June 2025. Question: Does the Council in any way rely on the embodied carbon of a basement as a basis for limiting basements to not exceed the footprint of the host building in area.. Answer: No. The draft new Local Plan does not propose any bespoke carbon compliance requirements for basement schemes. Rather, it proposes that the carbon intensity of proposed basement developments is reported at the planning application stage.

⁶ Drainage and surface water run-off – in existing situations where the original situation is already very efficient, i.e. the ground is fast draining, permeable soil and roof and surface water already goes to soakaways, it may not be possible to achieve improvement.

⁷ RBKC publication planning policy arboricultural impact – March 2014. Landmark Trees; LT RSP 2 RBKC 34.3.59. 18 March 2014. Appendix A to this document.

⁸ Comments on the Royal Borough of Kensington and Chelsea's draft basements policy. GS Ecology. Ref: ECO1565. 19 March 2014. Appendix B to this document.

basements, and so garden basements should continue to be permitted, thereby allowing a positively prepared policy to realise the potential benefits.

10. Our arguments are set out in this representation which makes clear which policy criterion and paragraph is being referred to and makes reference to the following evidence, submitted with this representation as appendices A to E:-

- a. RBKC publication planning policy arboricultural impact – March 2014. Landmark Trees; LT RSP 2 RBKC 34.3.59. 18 March 2014.
- b. Comments on the Royal Borough of Kensington and Chelsea’s draft basements policy. GS Ecology. Ref: ECO1565. 19 March 2014
- c. ASUC Guidelines on safe and efficient basement construction directly below or near to existing structures. 2nd Edition. July 2016.
- d. Ove Arup & Partners Ltd, Royal Borough of Kensington and Chelsea Basements Policy. Hydrologic review of second draft policy for public consultation. 29 April 2013.
- e. Evidence to demonstrate that trees of any size grow healthily to full size on top of garden basements. Association of Specialist Underpinning Contractors (ASUC). 22 June 2025.

Section 2. Association of Specialist Underpinning Contractors (ASUC)

11. ASUC is a trade association with 21 contractor members. There are additionally nine associate members – mainly engineers, designers and specialist suppliers. ASUC was established in 1992.
12. In total the members employ over 850 people with a turnover from ASUC related activity of over £80M. Members' total turnover is significantly higher than this.
13. Members' business is in the construction sector, mostly civil engineering and below ground construction including remedial work to stabilise existing buildings with failing foundations and / or subsidence, structural repairs to buildings and other structures such as bridges, and building new below ground structures (basements) often directly below or near to existing buildings or structures.
14. The standing of ASUC is demonstrated by the requirement for contractors undertaking below ground structural works on the Crown Estate and the Grosvenor Estate to be ASUC members. The association also works with the HSE and other bodies such as the Construction Leadership Council and Build UK to promote improved training and competence across the sector. In 2016 the association published the HSE endorsed document *ASUC Guidelines on safe and efficient basement construction directly below or near to existing structures* ("Appendix C")⁹. This document, which we have enclosed, could be used by the Council to promote safe and efficient basement development.
15. As an association we promote and expect of our members to have high standards of health & safety, quality of work including the maintenance of the stability of buildings, and consideration for local residents and those living and working nearby. Prospective members undergo a multi-stage, comprehensive third party audit that covers all of the above matters plus others including financial strength and the completeness of insurance cover. The average first time pass rate for contractors applying for membership is in the order of 1 in 10.
16. We are fully supportive of the various aspects included within the Council's Basement Impact Assessment (BIA). We view these, along with the requirement for compliance with Construction Management Plans (CMPs), as positive measures likely to make it more difficult for poor quality contractors to be able to work in the borough.
17. Our position is that the negative impacts of basement development can be managed effectively without the need for size limitations for basements in general but specifically without a ban on garden basements. The Council's limitation of a basement in a garden to 50% of the size of the garden, introduced in 2017, has, in the Council's own opinion, been effective.¹⁰

⁹ Included as appendix C to this document.

¹⁰ Council's response to Basement Force Ltd Question Set 1, Question 6 dated 12 June 2025. Question: Does the council have any evidence that the 2017 Policy A5 Basements is not being effective in managing the impacts of basement developments. These impacts would include structural stability, harm or damage to neighbouring properties, hydrology and hydrogeology, drainage and run-off or causing other damage to the water environment, trees and planting / gardens, amenity during construction,

Section 3. Camden's previous policies and guidance concerning basement development

18. The Council has adopted policies covering basements on two occasions previously:

- a. 2010 – Camden Development Policies. 2010-2025. Local Development Framework. DP27 Basements and lightwells (included with this submission).
- b. 2017 – Camden Local Plan. Policy A5 Basements (included with this submission).

19. The 2010 Policy DP27 had the following main requirements pertinent to this representation

- a. Will require developers to demonstrate by methodologies appropriate to the site that schemes.
 - i. Avoid adversely affecting drainage and run-off causing other damage to the water environment.
 - ii. Avoid cumulative impacts upon structural stability or the water environment in the local area.
- b. and will consider whether schemes.
 - i. Harm the amenity of neighbours.
 - ii. Lead to the loss of open space or trees of townscape or amenity value.
 - iii. Provide adequate landscaping, including adequate soil depth

20. The 2017 Policy A5 had the following main pertinent requirements:

- a. Not exceed 50% of each garden within the property.
- b. Extend into the garden no further than 50% of the depth of the garden
- c. Do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment (BIA) which shows that the scheme poses a risk of damage to neighbouring properties no higher than Buland Scale 1 'very slight'.
- d. Avoid adversely affecting drainage and run-off causing other damage to the water environment.
- e. Avoid cumulative impacts.
- f. Do not harm the amenity of neighbours.

architectural character and appearance, and biodiversity. **Answer: Policy A5 Basement in the Camden Local Plan is considered to be effective. We are therefore proposing to carry forward the policy with some focussed amendments.**

- g. Provide satisfactory landscaping, including adequate soil depth.
 - h. Do not harm the appearance or setting of the property or the established character of the surrounding area.
 - i. Do not prejudice the ability of the garden to support trees where they are part of the character of the area.
 - j. Generally require a Construction Management Plan.¹¹
21. The main differences between the 2010 Policy DP27 and the 2017 Policy A5 were
- a. The introduction of a size limitation on garden basements to 50% of each garden area.
 - b. The introduction of the BIA and other requirements as a means of managing various of the potential negative impacts.
22. The specific evidence provided for the 2017 Policy A5 in terms of impact on neighbours during construction (amenity), visual impacts (character, quality of gardens and vegetation) and biodiversity was the report *Camden Local Plan Evidence Report, Survey of basement development, February 2016*.
23. This same document from February 2016 has been included in the Council's supporting evidence for this policy D6.
24. No new evidence on the matters in the report has been produced by the Council to support this policy D6.

¹¹ A Construction Management Plan (CMP) sets out how the construction work will be undertaken including logistics. The CMP will be used to ensure that the construction work is undertaken so as not to cause unacceptable harm to amenity and to those living or working nearby.

Section 4. Policy context to the draft Plan

25. This is not intended to be a comprehensive assessment of relevant policy, but identifies the main policy influences on the basement policy in the draft Plan.
26. National policy in the NPPF has the presumption in favour of sustainable development at its heart and the three overarching objectives of the planning system (economic, social and environmental) should be pursued in mutually supportive ways [NPPF §8]. Plans should be positively prepared, serve a clear purpose, and be shaped by effective engagement with (amongst others) businesses [NPPF §16].

27. At paragraph 32 the NPPF states:-

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

28. Policies should be reviewed at least every five years and should be updated “as necessary” [NPPF §34]. The NPPF envisages changes to Local Plan policies would reflect changing circumstances or changes in national policy, neither of which is referenced by the Council in relation to the basements policy.
29. Plans are sound if they are positively prepared, justified, effective, and consistent with national policy [NPPF §36]. The tests of soundness are applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area [NPPF §37].
30. As with previous versions of the NPPF, there is a strong emphasis on the need to deliver a sufficient supply of homes (section 5); to build a strong and competitive economy (section 6); to ensure the vitality of town centres (section 7) and to promote healthy and safe communities (section 8). Basement development can contribute positively to all of these policy objectives, while making effective use of land (section 11), achieving well-designed places (section 12), meeting the challenge of climate change (section 14), and conserving both the natural and historic environment (sections 15 and 16).
31. Aside from the NPPF, the London Plan’s basement policy D10 – adopted in 2021 and forming part of the development plan – is relevant. The policy states that

Boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally.

32. Acknowledging that the Council has for many years now identified that the negative impacts of large-scale basement development can be an issue, it is appropriate therefore that any “negative impacts” should be addressed within a basement policy. However the proposed policy D6 in the draft Camden Local Plan goes well beyond addressing negative impacts in its blanket ban on the size of basements (D6 C3) and prescriptive prohibition of lightwells in certain locations (D6 C4). Policy D10 is entirely consistent with

the criteria-based policy suggested by ASUC, and does not justify these blanket restrictions.

33. Notably too, the London Plan says nothing about major development proposals on large sites which propose basement levels as part of new construction.

Section 5. Proposed changes to the policy

34. We are supportive of what appears to be the overall intention of the policy – to promote “good” basement development while preventing harmful development. Good development does not cause harm to:

- a. Neighbouring properties
- b. Existing structures or buildings
- c. Ground conditions, notably slope stability
- d. Water conditions either below ground or surface water including flooding
- e. The appearance of the area once construction is completed.
- f. The amenity of neighbours and local residents during construction.
- g. The architectural character of the host building.
- h. The significance of heritage assets and their settings.

35. However we consider that all of the above and more can be achieved without the restriction on the size of garden basements or the specific limitation on a new access or lightwell near to the boundary of a neighbouring property.

36. We therefore propose that the following changes are made to the proposed policy and plans

- a. Replace Policy D6 C (3) that states that basements should not exceed the footprint of the host building with
“Not exceed 50% of the area of each garden within the property”
- b. Add requirements for basements that extend beyond the footprint of the host building to require:
 - i. An acceptable landscaping and planting plan. The plan should require a natural and bucolic appearance, taking the opportunity for increased tree and other native planting, and limit / minimise areas of manicured lawn, non-native monoculture and paving or terrace.
 - ii. No net loss of biodiversity, or even a gain insofar as that is proportionate .
- c. Replace Policy D6 C (4) that states that development be set back from the neighbouring property boundaries where a new access or lightwell is being created, with
“ensure that any new access or lightwell does not cause unacceptable harm to neighbouring properties or to the street scene.”

Section 6. Response to items in the Local Plan – criteria A, B, C1 and C2Policy D6 - Basements

- A.** The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
1. neighbouring properties;
 2. the structural, ground, or water conditions of the area;
 3. the character and amenity of the area;
 4. the architectural character of the building; and
 5. the significance of heritage assets and their settings.

37. We are supportive of what appear to us as the aims of the policy – the promotion of “good” basement development and the avoidance of development that causes harm.

- A.** The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

38. The wording of this sentence could be improved:

- a. ‘... where it is demonstrated to its satisfaction...’

The assessment of a planning application should be objective, i.e. based against objective, evidence-based criteria. The policy should have criteria that can be assessed objectively by a third party. It should not be down to the Council’s potentially arbitrary opinion.

- b. ‘... would not cause harm...’

This is an absolute requirement meaning that if any harm, no matter how small, is caused then permission for development would not be granted. We suggest that the wording is changed to

‘... would not cause material harm...’

- c. The wording is negatively rather than positively written. Policies should be positively written with a presumption in favour of sustainable development.

- B.** In determining proposals for basements and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and, where appropriate, a Basement Construction Plan.

39. We have no objection to this and these are important safeguards. Prior to the adoption of the Council’s 2017 policy there were several well publicised basement developments

that had problems with structural stability, ground stability, surface water and flooding, neighbour amenity and damage to neighbouring buildings.

40. The Council's 2010 policy DP27 went some way to addressing these problematic issues but, as shown by the Council's 2016 Survey of basement development, this was not entirely effective.

41. The Council's 2017 policy A5 will have aimed to address these matters. The Council, in its own words, has stated that Policy A5 has been effective.

a. Question to Council, 4 June 2025:

Does the council have any evidence that the 2017 Policy A5 Basements is not being effective in managing the impacts of basement developments. These impacts would include structural stability, harm or damage to neighbouring properties, hydrology and hydrogeology, drainage and run-off or causing other damage to the water environment, trees and planting / gardens, amenity during construction, architectural character and appearance, and biodiversity

b. Response from Council, 12 June 2025:

Policy A5 Basement in the Camden Local Plan is considered to be effective. We are therefore proposing to carry forward the policy with some focussed amendments.

42. The Council has not stated that any areas of Policy A5 have not been effective and has not given any reasoned justification or supporting evidence that there are any areas of Policy A5 that have not been effective.

43. We submit that the terms of 2017 Policy A5 should be considered effective in dealing with the following matters, i.e. those confirmed as effective by the Council:

- a. Structural stability,
- b. Harm or damage to neighbouring properties,
- c. Hydrology and hydrogeology,
- d. Drainage and run-off or causing other damage to the water environment,
- e. Trees and planting / gardens,
- f. Amenity during construction
- g. Architectural character and appearance
- h. Biodiversity

44. Any restrictions on development beyond those in the 2017 Policy A5 should be supported by reasoned justification and proportionate evidence from developments with planning permissions granted after adoption of Policy A5.

45. Restrictions on development in the proposed policy without this necessary post 2017 Policy A5 reasoned justification and proportionate evidence would be unsound.

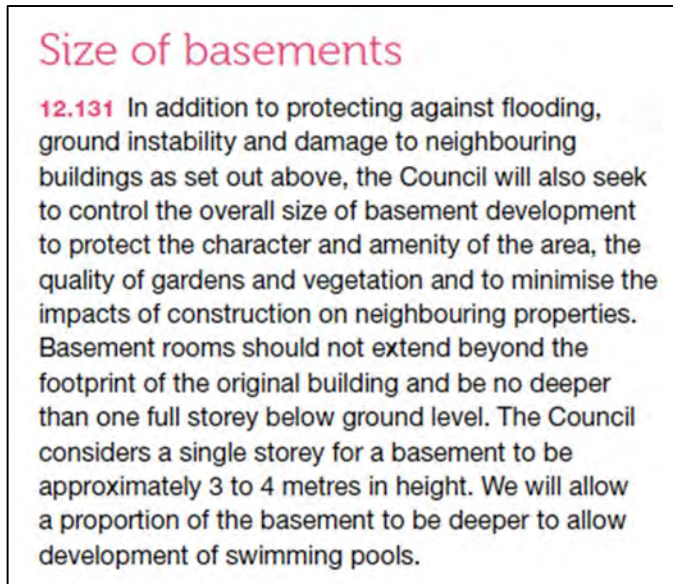
- C.** The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:
1. not comprise of more than one storey;
 2. not be built under an existing basement;
 3. not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement;
 4. be set back from neighbouring property boundaries where a new access or lightwell is being created; and
 5. avoid the loss of garden space or trees of townscape or amenity value from construction work or due to the creation of a new access or lightwell.

46. We do not object at this time to restrictions C1, C2 or C5. However we do ask, as covered previously, that it is recorded that we do not consider this restriction necessary for a policy to be effective in achieving the Council's planning objective of permitting "good" basement development while restricting development that would cause unacceptable harm.

47. We object to restrictions C3 and C4.

Section 7. Response to criterion C3. Not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement

48. The Council sets out in paragraph 12.131 the reasoned justification for the restrictions on the overall size of basement developments.



49. We list the stated reasons for the limit on size below:-
- a. To protect against flooding.
 - b. To protect against ground instability.
 - c. To protect against damage to neighbouring buildings.
 - d. To protect the character and amenity of the area.
 - e. To protect the quality of gardens and vegetation.
 - f. To minimise the impacts of construction on neighbouring properties.
50. The Council does not explain why the limit on size is needed to achieve those objectives. There is no support for it in the London Plan, and no other LPA in Greater London (of which there are 32) restricts the size of basement development so as to not extend beyond the footprint of the host building.
51. In our view restrictions on the size of basements are arbitrary and contrary to the presumption in favour of sustainable development.
52. With respect to not permitting basement development beyond the footprint of the host building, i.e. garden basements, the six reasons given by the Council can all:
- a. be addressed by good design and / or

- b. be managed by appropriate planning conditions, and / or
 - c. are not justified by proportionate evidence
53. We will consider each of the Council's six reasons in turn, then consider other matters that relate to the C3 restriction for basement development not to exceed the footprint of the host building.

To protect against flooding

54. We take it that by 'to protect against flooding' the Council means both to protect against flooding of the development property and also not to increase the risk of flooding to other properties by increasing the surface or other water being put into the public drainage system. We support fully both of these aims.
55. A garden basement is at not greater risk of being flooded than a basement under the host building. Protection in both cases should be provided by positively pumped devices removing surface water from lightwells, foul water from the basement or the minor seepage from a drained cavity membrane waterproofing system. The provision of positively pumped devices is already a requirement in the Council's current Basements Planning Guidance.¹²
56. The Council have not presented any new supporting evidence on flooding related to basement development. The Council relies on its own 2010 report by Ove Arup & Partners Ltd¹³ (Arup) which is referenced in its responses to the Regulation 18 consultation in 2024.¹⁴
57. This independent study considered the specific conditions across the borough and made recommendations on how to deal with all geological, hydrogeological and hydrological matters. Flooding falls within these matters.
58. Arup made no recommendation within this report to limit garden basements.
59. Instead Arup set out how basements extending beyond the footprint of the host building should be assessed with regards to these matters. The Arup report introduced the concept and contents of the Basement Impact Assessment (BIA). The BIA has been developed further since 2010 with guidance being given in Camden's series of Supplementary Planning Documents (SPDs). We note that Arup has never stated or suggested that garden basements should not be allowed on the basis of flooding or any other geological, hydrogeological and hydrological matter.
60. The Council has presented no further technical evidence on why basements extending beyond the footprint of the existing building should be restricted because of flooding.

¹² Camden Planning Guidance. Basements. January 2021. Page 45. Paragraph 6.13.

¹³ Ove Arup & Partners, Camden geological, hydrogeological and hydrological study. Guidance for subterranean development. Issue01. November 2010. Dated 18/11/10.

¹⁴ Camden. Appendix C Summary of Responses to Engagement on the Draft Local Plan. 616 page pdf. No page numbering. References to the 2010 Arup report are made in the Policy D6 – Basements section start on the 550th pdf page including on the 555th, 557th, 558th and 560th pages.

61. Separately we provide here a report by Arup (“Appendix D”)¹⁵ in relation to the Royal Borough of Kensington and Chelsea’s (RBKC) basement planning policy consultation process where RBKC sought to reduce the allowable basement area from 85% to 50% of any garden area. This report was written by the same team at Arup. The Arup team’s overall recommendation with respect to drainage and hydrological matters was:

We recommend that the policy be revised such that applications which are demonstrably not worse than current conditions (regardless of project size) and satisfy all other planning constraints (including demonstration that current conditions are satisfactory) be considered for approval.

62. The Arup team were stating that there should be no general restriction on the size of basements based on hydrogeological and hydrological matters, instead these matters should be assessed on a case by case basis.
63. The Council’s supporting evidence includes a February 2016 report, Camden Local Plan Evidence Report, Survey of basement development. The report includes a survey of 9,368 addresses that were within 25 metres of the 410 basements that the Council states were granted planning permission between 2010 and 2014. The Council states it received 614 responses. 496 responses are included in the Council’s survey report.
64. Of these 496 responses we can find five responses that raise problems of changes in ground drainage in neighbouring gardens. None of these five responses specifically state that the development included a basement that extends beyond the footprint of the host building or that the garden basement was thought to be the cause of the change in ground drainage.
65. The worst two examples we can find are:

Comment 37

The drainage of my garden has altered; it is now drier. A number of trees have been lost.

Comment 93

Our — garden is now totally waterlogged through last Winter & when it rains - ruined. So ruined lives for years - ruined garden for ever.

66. We cannot comment on the veracity of these comments or the cause. We recognise that there has been a failure in the BIA process if these are valid complaints.
67. However these relatively few negative responses (5 out of 614 responses from 9,368 issued surveys) were from planning permissions granted before the adoption of the 2017 Policy A5 and its enhanced BIA.

¹⁵ Ove Arup & Partners Ltd, Royal Borough of Kensington and Chelsea Basements Policy. Hydrologic review of second draft policy for public consultation. 29 April 2013. Appendix D to this document.

68. The Council has not presented any other supporting evidence concerning garden basements and their effect on drainage or any other hydrological or hydrogeological matters.
69. In summary, for basements that extend beyond the footprint of the host building
- a. Flooding is not a sound basis for not permitting development.
 - b. Matters related to flooding and other hydrological and hydrogeological issues can be dealt with by good design and should be considered on a case by case basis. This is as stated by the Council's own expert, Arup.
 - c. No evidence has been presented by the Council that there is or has been a problem with flooding since the adoption of the 2017 Policy A5 and the management of development using the BIA.
 - d. The Council has stated the Policy A5 has been effective with regards to flooding since adoption in 2017.
 - e. No evidence has been presented about concerns over cumulative impacts for drainage related to basement developments that extend beyond the footprint of the host building.

To protect against ground instability

70. Several historic basement developments in Camden had significant problems due to bad design and/or construction in relation to ground instability. Certain parts of Camden have steeply sloping ground and other specific geological, hydrological and hydrological conditions that cause high risk with regard to ground instability.
71. Camden instructed Arup to investigate this problem. The Arup 2010 study was the outcome of that investigation including the introduction of the BIA which, as mentioned, has been developed further over time.
72. Arup make no mention in their 2010 study of an increased risk of ground instability with respect to garden basements.
73. The risk from all basements with regard to ground instability has been managed effectively since the introduction of the BIA. The Council has presented no evidence to the contrary.
74. The Council has not presented reasoned justification or evidence that basements that extend beyond the footprint of the host building, with regard to ground instability:
- a. Have caused, in reality, more problems than basements under buildings.
 - b. Should be considered differently or as higher risk than basements under the building.
75. In summary, for basements that extend beyond the footprint of the host building

- a. Ground instability is not a sound basis for not permitting development.
- b. Ground instability with regard to all basement developments, including those that extend beyond the footprint of the host building, has been managed effectively by the Council through the BIA.
- c. The Council has stated the Policy A5 has been effective with regards to managing ground instability since its adoption in 2017.
- d. The Council has not provided proportionate evidence that development should not be permitted because of anything to do with ground instability.

To protect against damage to neighbouring buildings

76. Again, as for the previous item, ground instability, there have been historic basement developments in Camden that caused damage to neighbouring buildings.
77. The Council has managed these matters effectively with the introduction of the BIA and the adoption of the 2017 Policy A5 and its enhanced BIA, supported by the improvements to the Council's planning guidance SPDs in 2015 and 2021.
78. The Council has stated that its Policy A5 has been effective¹⁶. The Council has not stated that damage to neighbouring properties has continued to be a problem and has not presented any evidence that damage to neighbouring buildings has remained a problem after the adoption of the 2017 Policy A5.
79. Separately the Council has never stated that basements that extend beyond the footprint of the host building have been more of a problem than basements under the host building in causing damage to neighbouring properties and Arup, the Council's technical expert, nor any other expert for the Council has ever stated this to be the case.
80. In summary
- a. The Council should not be relying on damage to neighbouring buildings as a justification for not permitting development that extends beyond the footprint of the host building, this would clearly be unsound.
 - b. The Council has never presented supporting evidence that basements that extend beyond the footprint of the host building have caused more damage to neighbouring properties than any other form of basement development.

¹⁶ Council's response to Basement Force Ltd Question Set 1, Question 6 dated 12 June 2025. Question: Does the council have any evidence that the 2017 Policy A5 Basements is not being effective in managing the impacts of basement developments. These impacts would include structural stability, harm or damage to neighbouring properties, hydrology and hydrogeology, drainage and run-off or causing other damage to the water environment, trees and planting / gardens, amenity during construction, architectural character and appearance, and biodiversity. Answer: Policy A5 Basement in the Camden Local Plan is considered to be effective. We are therefore proposing to carry forward the policy with some focussed amendments.

- c. The Council's own experts do not state that basements that extend beyond the footprint of the host building have a higher risk of causing damage than basements under the host building.
- d. The Council manages all damage, including for basements that extend beyond the footprint of the host building, effectively already via its BIA process.

To protect the character and amenity of the area

- 81. We will consider amenity during construction under the later section "To minimise the impacts of construction on neighbouring properties".
- 82. In this section we will consider character and amenity of the development after completion of construction for basements that extent beyond the footprint of the host building.
- 83. The Council has included in its supporting evidence the February 2016 report, Camden Local Plan Evidence Report, Survey of basement development. This report includes the following potentially relevant information
 - a. Survey of neighbours
 - b. Visual impacts
- 84. The evidence in this report is based on planning permissions granted between 2010 and 2014, several years before the adoption of Policy A5 in 2017 and the Council's planning guidance documents in 2015 and 2021, all of which increased the Council's restrictions and controls over character and amenity. For example the 2021 planning guidance is more restrictive than the 2013 guidance with respect to lightwells and on appearance and character in conservation areas.
- 85. The Council's evidence does not reflect or take into account in any way the policy and guidance that has been in place for the last eight years.
- 86. Going back to the survey of neighbours in the out of date report. This is the same survey as we considered above in relation to Flooding. The survey was sent to 9,368 addresses that were within 25 metres of the 410 basements that the Council states were granted planning permission between 2010 and 2014. The Council states it received 614 responses to the consultation, 496 responses are included in the Council's survey report.
- 87. Nine of these 614 responses related specifically to the character and amenity of the gardens once work had been completed. All nine of these responses related to the appearance of gardens and not to the character of the property other than the garden. We will cover these responses in the next section on the quality of gardens and vegetation. Suffice it to say that the matters raised in these nine responses could have been dealt with by good design required by a positively prepared policy and the use of effective planning conditions.
- 88. So, excluding the appearance of the gardens, none of the responses raised any concerns around the impact on local character and amenity of any of the 410 basements

with permissions from before 2014 with regard to basements that extend beyond the footprint of the host building.

89. The Council's evidence for visual impacts in the same 2016 report covers the appearance of eight developments on pages 16 to 23, with before ariel photographs from 2007 and after ariel photographs from 2014.
90. The development on page 23 of that report is still under construction and should be disregarded. This leaves a sample of seven developments.
91. We do not know how many, if any, of these developments involved development beyond the extent of the host building. The addresses of the properties have not been given. We have asked the Council for the addresses of these properties but the Council has refused to provide these stating that *"The Survey of Basement Development (2016) deliberately used anonymous examples to avoid identification of the properties. It is therefore not considered appropriate to provide the property addresses"*.¹⁷
92. We can therefore not:
- a. Verify that these planning permissions allowed development that extended beyond the footprint of the host building – if not then they are not relevant to the Council's proposed restriction of development beyond the footprint of the host building.
 - b. Verify that the implemented permission did result in development beyond the footprint of the host building.
 - c. Verify whether or not appropriate planning conditions were included in the planning permissions.
 - d. Verify whether or not any planning conditions that were included have been implemented and managed effectively.
 - e. Conduct an up to date survey of the properties to see if the appearance has improved over time. For example planting in garden areas will usually mature in the years following development and planting.
93. The Council has simply not included sufficient supporting evidence, putting aside its age and lack of relevance to the current policy, to demonstrate that basement development beyond the extent of the footprint of the host building causes any problems with regards to character and amenity of the area.

¹⁷ Council's response to Basement Force Ltd Question Set 1, Question 2 dated 12 June 2025. Question: Aerial photographs of eight properties are included in the council's evidence document *Camden Local Plan Evidence Report. Survey of basement development. February 2016*, pages 16 to 23. Can the council please provide the addresses of these eight properties. Answer: *The Survey of Basement Development (2016) deliberately used anonymous examples to avoid identification of the properties. It is therefore not considered appropriate to provide the property addresses.*

94. Separately to the above, the visual impacts survey in the 2016 report should be given little weight because the 2017 Policy A5 specifically addresses all of these matters regarding character and amenity of the area by the inclusion of the following criteria

The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to: ...

c. the character and amenity of the area;

d. the architectural character of the building; ...

... The Council will require applicants to demonstrate that proposals for basements:

q. do not harm the amenity of neighbours;

r. provide satisfactory landscaping, including adequate soil depth;

s. do not harm the appearance or setting of the property or the established character of the surrounding area;

t. protect important archaeological remains; and

u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

95. And even if the above were not the case then rather than impose a blanket restriction on basement development beyond the footprint of the host building, the Council could instead manage the potential impact for character and amenity of the area in the way it did in the 2017 Plan. The Council has absolute control via its planning policy and guidance over the appearance and character of any development, including all basement development, subject to that planning policy and guidance being lawful. Basement development that extends beyond the footprint of the host building is subject to the same level of control and could be managed by a positively prepared policy.

96. The Council has stated the Policy A5 has been effective with regards to protecting character and amenity since its adoption in 2017.

97. In summary, for basements that extend beyond the footprint of the host building

- a. Character and amenity of the area is not a sound basis for not permitting development.
- b. The Council has not provided proportionate evidence to demonstrate that this is not the case.
- c. Character and amenity have been effectively managed by the Council's 2017 Policy A5 and supporting supplementary planning guidance.
- d. The Council has stated that character and amenity have been effectively managed by Policy A5 since 2017.

- e. And even if this were not the case then the Council could manage the potential impact using a positively prepared policy.

To protect the quality of gardens and vegetation

98. The Council does not provide specific reasoned justification for the banning of basement development beyond the footprint of the existing host building on the basis of the quality of gardens and vegetation. Neither does it provide proportionate supporting evidence.
99. In paragraph 12.139 the Council sets out its intention to protect gardens and trees however it does not link this to the ban on basement development beyond the footprint of the host building.
100. We support fully the aim of paragraph 12.139, the protection of gardens and trees. Indeed we go further and would wish to see a policy for basement development beyond the footprint of the host building that would not only protect existing trees of amenity value but would enhance gardens by taking the opportunity to increase native tree planting where possible, require landscaping of a natural and bucolic nature and realise biodiversity net gains (BNG) where practicable.
101. The Council relies on its February 2016 Camden Local Plan Evidence Report as supporting evidence in relation to gardens and vegetation, as it did in the previous section for character and amenity. This report includes the following potentially relevant information
- a. Survey of neighbours
 - b. Visual impacts
 - c. Biodiversity
102. The survey, as covered previously, was of 9,368 addresses that were within 25 metres of the 410 basements that the Council states were granted planning permission between 2010 and 2014. The Council states it received 614 responses, 496 responses are included in the Council's survey report.
103. Nine of these responses, from the 614 responses received from the 9,368 surveyed addresses, raised negative comments about the impact caused by a basement development that extended beyond the footprint of the house. We include below six of these

Comment 50

In addition, gardens that had been attractive to wildlife have been reduced in size and often largely covered with stone and / or artificial turf which are likely to be less beneficial.

Comment 91

My only major objection was the removal of a magnificent tree in the rear garden —, ostensibly because the tree was 'diseased' which was clearly untrue but permission was granted anyway.

Comment 112

The basement development resulted in a beautiful garden being destroyed and six trees being felled. There were promises by the developers to replace the felled trees at the end of the project, but the scale of the concrete development was such that there was insufficient top soil left for any trees to be planted by the end of the project.

Comment 125

I very much regret that the rear garden — has been mostly concreted over and the small wildlife passage at the end of the garden — has been taken away in order to provide a small planting area bordering the back concrete patio. The adjoining gardens — are all — woodland gardens. My own garden at — is planted mostly with shade-loving or woodland plants and retains the narrow wildlife passage at the end of the garden. The whole 'ecology' of the garden — has completely disappeared which is a great shame, wrecked by a poorly thought out concrete area.

Comment 198

...Property looks very good indeed but don't like garden with artificial grass....

Comment 225

The new owners — deeply excavated the extensive garden and replaced it with brick and concrete, encountering subterranean rivers in the process.

104. All of these instances are bad and should not have happened.
105. However we submit that all nine of these do not provide evidence supporting a ban on basement developments under gardens, rather they demonstrate that at the time that these permissions were granted, 2010 to 2014, basement development was not being effectively managed. Policy A5 was not yet in place and the Council's planning guidance was not sufficiently developed.
106. The Council has stated recently that it considers that basement development is now being effectively managed¹⁸.

¹⁸ Council's response to Basement Force Ltd Question Set 1, Question 6 dated 12 June 2025. Question: Does the council have any evidence that the 2017 Policy A5 Basements is not being effective in managing the impacts of basement developments. These impacts would include structural stability, harm or damage to neighbouring properties, hydrology and hydrogeology, drainage and run-off or causing other damage to the water environment, trees and planting / gardens, amenity during construction,

107. We do not take issue with this. The Council's Policy A5 addresses the matter of protecting the quality of gardens and vegetation as follows:

The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to: ...

c. the character and amenity of the area; ...

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should: ...

m. avoid the loss of garden space or trees of townscape or amenity value.

... The Council will require applicants to demonstrate that proposals for basements: ...

q. do not harm the amenity of neighbours;

r. provide satisfactory landscaping, including adequate soil depth;

s. do not harm the appearance or setting of the property or the established character of the surrounding area; ...

u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

108. We agree with the Council that the nine negative responses received from the survey of near-neighbours would not have been made if the Council's effective 2017 Policy A5 had been in place in the period 2010 to 2014 when the planning permissions were granted that caused these responses.

109. The Council's 2021 Planning Guidance on Basements provides guidance and measures, page 20, that supports trees, landscape and biodiversity. In summary these require

- a. That the garden area preserves or enhances the garden area for trees, other vegetation and biodiversity
- b. Sufficient margins should be left between the site boundaries and any basement construction to enable natural processes to occur and for vegetation to grow naturally.
- c. These margins should be wide enough to sustain the growth and mature development of the characteristic tree species and vegetation of the area.

architectural character and appearance, and biodiversity. **Answer: Policy A5 Basement in the Camden Local Plan is considered to be effective. We are therefore proposing to carry forward the policy with some focussed amendments.**

- d. That gardens maintain their biodiversity function for flora and fauna and that they are capable of continuing to contribute to the landscape character of an area so that this can be preserved or enhanced
 - e. That a minimum of 1 metre of soil be provided above basement development that extends beyond the footprint of the building, to enable garden planting and to mitigate the effect on infiltration capacity.
 - f. Consideration should be given to trees on or adjacent to the site, including street trees, and the required root protection of these trees.
 - g. Arboricultural surveys and arboricultural method statements will be required to protect existing trees.
110. We support all of these measures and submit that if these had been in place and had been managed properly in 2010 to 2014 then all of the basements that extend beyond the footprint of the host building would have been acceptable with regards to the quality of gardens, vegetation and trees.
111. Further to this we submit evidence that demonstrates that provided the basement development beyond the footprint of the host building is based on the 2017 Policy A5 and subsequent planning guidance that:
- a. Any major tree grown in the UK can be planted and thrive on top of a basement development that extends beyond the footprint of the host building ("Appendix A")¹⁹.
 - b. There should be no biodiversity reasons for limiting basement development to the footprint of the host building ("Appendix B")²⁰.
112. The Landmark Trees report dated 18th March 2014 was written in response to RBKC's proposed planning policy that sought to limit garden basement development from 85% to 50% of each garden area.
113. The main relevant points from this report are, in relation to a basement extending to 85% of a garden area
- a. The undulation of a garden over a basement is not restricted in any way. A garden over a basement can be as undulating as desired now and at any time into the future – this speaks to landscaping plans that can be natural and bucolic in nature and appearance, they do not need to be artificially flat or manicured.
 - b. Ground of one metre depth over a concrete basement roof does not restrict the range of planting in any way, including major trees.

¹⁹ RBKC publication planning policy arboricultural impact – March 2014. Landmark Trees; LT RSP 2 RBKC 34.3.59. 18 March 2014. Appendix A to this document.

²⁰ Comments on the RBKC report "The potential of basement excavation on biodiversity" - 19 March 2014; GS Ecology Ltd. Appendix B to this document.

- c. Any major tree grown in the UK can reach maturity and live for a normal life span in 600mm of fertile soil. One metre is more than adequate.
 - d. One metre of soil is more than adequate to structurally support any major tree grown in the UK.
114. The diagram below, from the Landmark Trees report, is useful in demonstrating why the one metre of soil supports the healthy grown of any size tree.

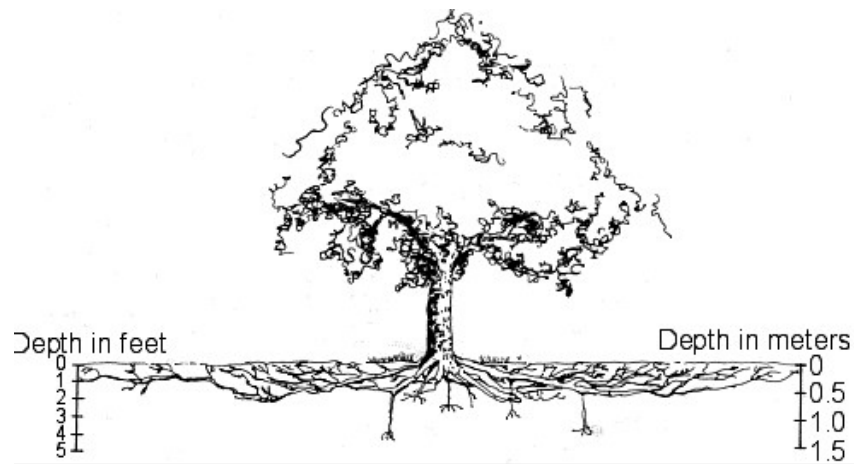


Figure 1: in mature trees the tap root is either lost or reduced in size. The vast majority of the root system is composed of horizontally oriented lateral roots²¹

115. Additional evidence that demonstrates that trees of any size can be planted and thrive on top of basements that extend beyond the footprint of the host building is attached at enclosure e to this representation ("Appendix E")²².
116. A summary of this Appendix E is:
- a. Healthy, bucolic gardens can be required by planning condition and can be delivered in practice with mature trees being planted and thriving on top of garden basements with one metre of soil.
 - b. In the two examples the basement extends for 85% of the garden area and both demonstrate high quality gardens with good tree cover.
 - c. Planting and trees on top of basements that extend beyond the footprint of the host building are shown to improve on the original condition where pre-development the external areas were 100% hard paving and with no planting now hosts a thriving mature tree and other healthy planting
 - d. The drainage situation at this property has been improved from all surface water in the external areas flowing directly into the public drainage system to a post-development situation where all of the surface water from the garden passes

²¹ Source. Harris RW et al 2004; Arboriculture Fourth Edition, Prentice Hall, NJ, America.

²² Evidence to demonstrate that trees of any size grow healthily to full size on top of garden basements. Association of Specialist Underpinning Contractors (ASUC). 22 June 2025. Appendix E to this document.

directly into the ground with none of the surface water going directly into the public drainage system.

- e. Mature trees are routinely grown in large numbers by the commercial tree industry in soil volumes that are significantly lower than are afforded by a basements with one metre of soil cover that extends beyond the footprint of the host building.

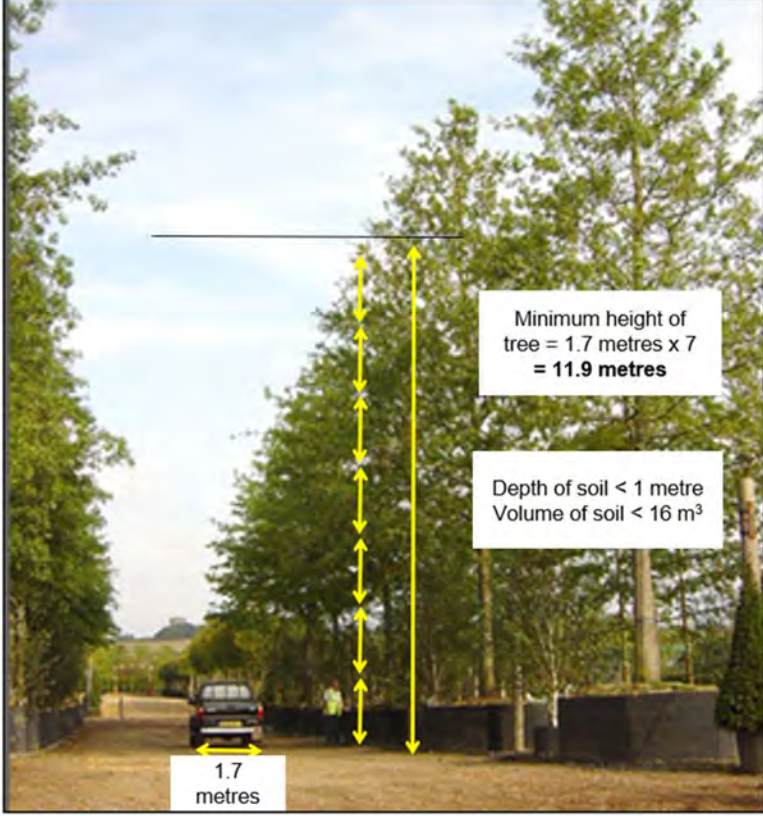
117. The following three pictures are from Appendix E.



Front garden above basement 13 years after development – pictures taken June 2025 – basement under 85% of front garden – all trees and other planting are directly above the basement under the front garden except for the hedge at the front next to the public footpath (the hedge opposite the red car)



Rear garden 12 years after development (2025) – rear garden area marked in red -
basement under 85% of rear garden – pre-development the rear garden was 100%
hard paving and had no planting or trees and all the surface water from the hard
paving went directly into the public drainage system



Nursery trees – these trees are grown in restricted size planters to maturity

Grow to:

- Full size
- Full lifespan
- Healthy

Trees need:

- Sufficient 'good' soil
- Water
- Air
- Nutrients

Minimum height of tree = 1.7 metres x 7 = 11.9 metres

Depth of soil < 1 metre
Volume of soil < 16 m³

1.7 metres

Semi mature and mature trees are routinely grown in large numbers by the commercial tree industry in soil volumes that are significantly lower than are afforded by a garden basement with one metre of soil cover

118. In terms of biodiversity the GS Ecology report was also written in response to RBKC's proposed planning policy that sought to limit garden basement development from 85% to 50% of each garden area.

119. The summary conclusion, again in relation to a basement extending to 85% of a garden area is

As long as it can be demonstrate (sic) that a mature and wildlife friendly landscaping scheme with space for large canopy trees as appropriate can be provided there should be no biodiversity reasons for limiting the extent of basement developments to 50% of the garden area

120. The report is stating that there should be no good ecological or biodiversity reasons for limiting basement development to 85% of a garden area, never mind 50%, provided the measures that are required by the Camden 2019 Policy A5 and supporting guidance are in place.

121. Further to this the proposed policy could take the opportunity to cause improvements in garden space and trees, and in biodiversity.

122. The proposed policy could require a pre-start condition requiring a landscaping design that requires:
- a natural, bucolic garden appearance with wild flowers and natural planting being required as opposed to sanitised, paved or manicured lawn areas.
 - The planting of additional semi-mature trees where practicable. The one metre of soil already required over the roof of a garden basement, as demonstrated, allows the healthy planting and growth of a tree of any size, there is no limitation to tree size or planting from the existence of a garden basement.
123. And the proposed policy could require a pre-start planning condition for a net gain in biodiversity in the garden above a new basement development, to go hand in hand with the landscaping plan. As started in the 2014 GS Ecology report
- “... if prior to construction a garden were to be of limited ecological value and a wildlife friendly landscaping scheme was implemented, the proposals are likely to result in a net biodiversity gain”*
124. A BNG condition could require a significant enhancement potentially achieved through items to benefit biodiversity, from ponds to exclusion of non-native species and inclusion of varied native wild planting to bat roosts and bird boxes.
125. In summary, for basements that extend beyond the footprint of the host building
- The quality of gardens, vegetation and trees is not a sound basis for not permitting development.
 - The Council has not provided proportionate evidence to demonstrate that this is not the case, in that its survey evidence pre-dates the development of basement policy and is in any event unpersuasive, whereas we refer to persuasive evidence demonstrating the compatibility of basement development under gardens with the Council's objectives.
 - The quality of gardens, vegetation and trees have been effectively managed by the Council's 2017 Policy A5 and supporting supplementary planning guidance.
 - And even if this were not the case then the Council could manage the potential impact using a positively prepared policy.
 - The Council can and should take the opportunity to use permissions for basement development that extend beyond the footprint of the host building to improve on the quality of gardens, vegetation and tree planting, including if the Council wishes to increase the quantity of natural and bucolic gardens, and to drive BNG.

To minimise the impacts of construction on neighbouring properties

126. The Council has not provided specific reasoned justification for the banning of all basement development beyond the footprint of the existing host building on the basis of the impacts of construction on neighbouring properties.
127. The Council has also not provided proportionate supporting evidence to demonstrate that basement development beyond the footprint of the host building is the cause of negative construction impact on neighbouring properties, and certainly not that negative construction impact due to garden basement development is greater than for basement development under the footprint of the host building.
128. The Council has presented limited and largely out of date evidence with respect to the impacts of construction on neighbouring properties from basement development that extends beyond the footprint of the host building
- a. Responses to the February 2016 neighbours survey in the Council's Survey of basement development report.
 - b. Response in the Summary of responses to engagement on the Local Plan consultation in 2024.
129. There are three responses, from the 614 responses received by the Council from the 9,368 addresses surveyed, that relate to construction impacts from basement developments that extend beyond the footprint of the host building

Comment 88

... What the developers did is dig under not only the property building but under the whole boundary including garden and front garden to triple his footprint. The noise and disruption of diggers and dirt was insufferable. Please limit developments so that these are kept to one storey only for detached buildings, have a structural surveyors report including rivers that lie underground, have insurance for rebuilding adjoining properties affected and limited to buildings themselves rather than rear boundaries of other buildings. — for instance, lies on culverted river and lakes in C18th maps - not great for digging beneath - leaving flooding for others!

Comment 194

... The people next door are digging up their garden to extend their basement flat, which is fine. They have the space to expand and the money. Fair play to them! We have just been frustrated by the weekend construction schedule. The digging and heavy machinery usage starts right at 8am, which is too early. 9am would be much more manageable. 8am is rough after big Friday night out.

Comment 225

The new owners — deeply excavated the extensive garden and replaced it with brick and concrete, encountering subterranean rivers in the process. The entire process was needless, noisy and disruptive...

130. Only one of these three responses appears to request that basement development that extends beyond the footprint of the host building is curtailed.
131. One of the other two appears to object to any form of basement development and the third respondent raises issue with the weekday start of 8am and noisy works on Saturday mornings.
132. We have sympathy with the third respondent and would support changes to noisy working times, in line with the times used by other Local Authorities where there is significant basement development, over the current allowed timings in the Council's 2021 planning guidance, namely
- a. No noisy works on Saturday mornings.
 - b. High Impact Construction work (e.g. percussive breaking, drilling and percussive piling) limited to 9am to midday and 2pm to 5.30pm, Monday to Friday.
 - c. Construction traffic visiting site for deliveries / collections / spoil away limited to 9am to 4.30pm Monday to Friday, and not at all on Saturdays.
133. There was one response to the 2024 Regulation 19 consultation on the Draft Local Plan concerning the size of basements and construction impact.

Response

Support limits on the size of basements because their construction may impact on the health and wellbeing of neighbours

Council's Response

Support welcomed

134. In summary the supporting evidence for limiting basement development beyond the footprint of the host building because of construction impact is:
- a. One response, from 9,368 addresses surveyed with basement developments with a planning permission granted between 2010 and 2014.
 - b. One supportive comment to the 2024 Regulation 19 consultation on the Draft Local Plan.
135. This level of supporting evidence is not considered proportionate as the basis for the proposed alteration in the proposed policy restriction, a total ban, with regard to basement development beyond the footprint of the host building. But it is not just the number of responses, as planning policy is not an election or popularity contest: rather,

none of the Council's evidence addresses the fact that existing protections, if applied and enforced, are capable of protecting the amenity of neighbours.

136. We raise again, the Council has stated recently that it considers that basement development is now being effectively managed effectively, including with regard to amenity during construction ²³.
137. And again, we do not take issue with this. The Council's Policy A5 addresses the matter of minimising the impact of construction impacts on neighbouring properties as follows
- The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to: ...*
- c. the character and amenity of the area; ...*
- ... The Council will require applicants to demonstrate that proposals for basements:*
- ...*
- p. avoid cumulative impacts;*
- q. do not harm the amenity of neighbours;*
138. The Council's Planning Guidance – Basements, January 2021 requires further controls including

- a. Sites to be registered with the Considerate Constructors Scheme (CCS) and to operate in accordance with CCS requirements.
- b. Construction and demolition processes to conform to the Institution of Civil Engineers (ICE) Demolition Protocol.
- c. Sites to work in accordance with the Council's 'Guide for Contractors working in Camden'.
- d. Sites to work in accordance with the Greater London Authority's (GLA's) best practice guidance document for The Control of dust and Emissions from Construction and Demolition.
- e. Submission of an acceptable Construction Management Plan (CMP), including consultation with neighbours, to manage and mitigate the construction impacts.

²³ Council's response to Basement Force Ltd Question Set 1, Question 6 dated 12 June 2025. Question: Does the council have any evidence that the 2017 Policy A5 Basements is not being effective in managing the impacts of basement developments. These impacts would include structural stability, harm or damage to neighbouring properties, hydrology and hydrogeology, drainage and run-off or causing other damage to the water environment, trees and planting / gardens, amenity during construction, architectural character and appearance, and biodiversity. Answer: Policy A5 Basement in the Camden Local Plan is considered to be effective. We are therefore proposing to carry forward the policy with some focussed amendments.

- f. Working hours being limited to:
 - i. Mondays to Friday – 8am to 6pm
 - ii. Saturdays – 8am to 1pm
 - iii. Sundays and Bank Holidays – No noisy work
139. These further controls did not start to be developed until 2015. i.e. these controls were not in place during the 2010 to 2014 period when the planning permissions were granted for the basement developments that were the subject of the survey in the Council's Camden Local Plan Evidence Report that has been submitted as supporting evidence for this proposed planning policy, Basements D6.
140. In summary, for basement development that extends beyond the footprint of the host building
- a. Minimising the impacts of construction on neighbouring properties is not a sound basis for imposing a ban on basement development extending beyond the footprint of the building.
 - b. The Council has not provided reasoned justification for the proposed total ban.
 - c. The Council has not provided proportionate evidence to support the proposed ban.
 - d. The Council has stated that the 2017 Policy A5 and supporting guidance is managing amenity during construction effectively.
 - e. The Council has not provided evidence that this is not the case.
141. We suggest that the Council could improve the management of construction impacts by changes to the CMP requirements and other control measures including
- a. Not allow noisy works on Saturday mornings.
 - b. Limit high impact construction works to specific periods during the working day, we suggest 9am to midday and 2pm to 5.30pm, Monday to Friday for percussive breaking, drilling and percussive piling.
 - c. Limit construction traffic times to avoid high volume traffic periods, i.e. to avoid the morning and afternoon rush hours. We suggest limiting construction traffic visiting site for deliveries / collections / spoil away to 9am to 4.30pm Monday to Friday, and not at all on Saturdays.
142. We would be happy to support the Council in developing these and other potential measures.

Section 8. Response to criterion C4. Be set back from neighbouring property boundaries where a new access or lightwell is being created

143. The Council has not given any reasoned justification to support the criterion that a new access to the basement or lightwell should be set back from neighbouring property boundaries. Paragraph 12.144 of the Local Plan Proposed Submission Draft simply states

Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Excessively large lightwells will be resisted.

144. This restates criterion C (4) but does not justify it. We cannot find reasoned justification for this criterion in the Local Plan Proposed Submission Draft or in the other documentation.
145. The Council has not provided supporting evidence for this criterion or that demonstrates that new access or lightwells on or near to the boundaries of neighbouring properties have caused or will cause problems.
146. We cannot find evidence to support this criterion in either the Camden Local Plan Evidence Report, Survey of basement development, February 2016; in the responses to the Consultation on the Regulation 18 Draft Camden Local Plan, or in any of the other information provided by the Council.
147. The Council's current Policy A5 addresses the potential harms that we can envisage might potentially be caused by a new access or lightwells on or near to the boundaries of neighbouring properties, namely it requires that proposals:

n. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';

o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;

p. avoid cumulative impacts;

q. do not harm the amenity of neighbours;

r. provide satisfactory landscaping, including adequate soil depth;

s. do not harm the appearance or setting of the property or the established character of the surrounding area; ...

...u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

148. Just as one example, a new access or lightwell at or near to the property boundary where there is a brick wall on the boundary, for example a high garden wall or the side

wall of a building on the boundary, could be designed and built that would satisfy all of the above criteria and would not cause harm.

149. We understand that criterion C (4) is in the existing Policy A5 Basements. However it is not considered sound because it would prevent development that does not cause harm for no good reason. The criterion should be therefore be reviewed and omitted.

Section 9. Response to criteria D and E and specific sections in the supporting text

D. Exemptions to C(1) to C(5) above may be made on large comprehensively planned sites.

150. We are supportive that exemptions from restrictions C(1) to C(5) may be made for large comprehensively planned sites – essentially these developments are being assessed on a case by case basis, needing to demonstrate that they are not causing material harm.
151. However, even if the points we make about the individual criteria are not accepted, the potential for exemption should apply to all developments which can demonstrate that they would not cause material harm across the various criteria. There is no sound planning reason to object to this request.

E. The Council will require applicants to demonstrate that proposals for basements;

1. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
2. avoid adversely affecting drainage and run-off or causing other damage to the water environment;
3. have sought to reduce the embodied carbon of the basement. The Council will request the applicant to provide data showing the upfront embodied carbon of the basement proposal;
4. avoid cumulative impacts;
5. do not harm the amenity of neighbours;
6. do not harm the appearance or setting of the property or the established character of the surrounding area;
7. protect important archaeological remains; and
8. ensure impacts on any green/garden space or trees are minimised and where residual impacts do arise that this is addressed through appropriate restoration and replacement, prioritising biodiversity enhancements where possible.

152. We are supportive of items E (1) and (2), and E (4) to (8).
153. A question was raised to the Council on item E (3) to clarify the purpose of the criterion.²⁴

²⁴ Council's response to Basement Force Ltd Question Set 3, Question 2 dated 12 June 2025. Question: Does the Council in any way rely on the embodied carbon of a basement as a basis for limiting basements to not exceed the footprint of the host building in area. Answer: No. The draft new Local Plan does not propose any bespoke carbon compliance requirements for basement schemes. Rather, it proposes that the carbon intensity of proposed basement developments is reported at the planning application stage.

Question to Council

Does the Council in any way rely on the embodied carbon of a basement as a basis for limiting basements to not exceed the footprint of the host building in area.

Council's Response

No. The draft new Local Plan does not propose any bespoke carbon compliance requirements for basement schemes. Rather, it proposes that the carbon intensity of proposed basement developments is reported at the planning application stage.

154. We ask that the Council's response is noted for the record and that no carbon requirements beyond this are introduced to future planning guidance.
155. On this basis we do not object to this criterion.
156. We also ask that it is noted that while the Council has concentrated on embodied carbon during construction the more correct measure of carbon in the build environment is Whole Life Cycle (WLC), which is the industry accepted norm.
157. Separately, we have assessed the amount of concrete used in residential basement development across Greater London as a proportion of the total amount of concrete used in the same area. We assess the proportion as 1.55% of all concrete in Greater London is used in residential basements.
158. This is a relatively small percentage and, we suggest, does not support as proportionate the amount of effort that the Council appears to be dedicating towards recording carbon data from residential basement developments in the borough.

Estimated concrete used in residential basements in Greater London in one year	51,162 m ³
Estimated total concrete used in Greater London in one year	3,300,000 m ³
Percentage of total concrete used in residential basement across Greater London	1.55%

Source: 1. Urban Geography. 2022, VOL. 43, NO. 9. May 2021. 2. Mineral Products Association and British ready-mixed concrete association. Ready-mixed concrete report. 2016. ASUC analysis.

12.141 The Council will only permit basements where they do not cause harm to the significance of a listed building or its garden. Listed buildings often form an intrinsic element of the character of conservation areas and therefore basement development which harms the special architectural and historic interest of a listed building is also likely to fail to preserve or enhance the character or appearance of the conservation area in which it is located. Further details on the Council's approach to preserving heritage assets are set out in Policy D5 (Historic Environment).

159. We support the aim of the policy which is to protect listed buildings while allowing basement development where it does not cause harm to the significance of these heritage assets.
160. No greater requirements or restrictions per se should be placed on basement development in terms of protection of listed buildings or other heritage assets than is required by law and national policy, and applicable to other types of development. On occasion some harm is necessary to secure the optimum viable use of a listed building and/or outweighed by related heritage and other benefits. In such circumstances, the supporting text should not imply that the Council intends to operate a more restrictive policy.
161. The wording in the first line of 12.141, '*...where they do not cause harm to the significance of a listed building or its garden*', should be changed to '*...where they accord with national policy on development affecting designated heritage assets*'.

Lightwells

12.142 Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the building, the character and appearance of the surrounding area, or the relationship between the building and the street. In situations where lightwells are not part of the established street character, the characteristics of the front garden or forecourt will be used to help determine the suitability of lightwells.

12.143 In plots where the front garden is quite shallow, a lightwell is likely to consume much, or all, of the garden area. This will be unacceptable in streets where lightwells are not part of the established character and where the front gardens have an important role in the local townscape.

12.144 Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Excessively large lightwells will be resisted.

162. These paragraphs are negatively written, having a presumption against sustainable development. Development should be permitted where unacceptable harm is not caused.
163. The presence of basements and lightwells in the existing streetscape should not be a prerequisite for development. Rather good design and the avoidance of harm should be the basis for development being approved.
164. We consider the proper aims of the policy are best achieved by
 - a. Replacing paragraph 12.142 with wording such as the following: “Lightwells should not cause material harm to the character or appearance of the area. [Lightwells, roof lights, plant, railings and means of escape are examples of features which need particular care.]”.
 - b. Paragraph 12.143 – to be omitted.
 - c. Paragraph 12.144 – first sentence to be omitted, second sentence to remain “Excessively large lightwells will be resisted”.

Party Wall Act and security for expenses

12.145 The Council expects developers to offer security in all instances where basement schemes have a risk of causing damage to neighbouring property. Building owners are required to meet a number of obligations under the Party Wall Act 1996 where there is excavation near a neighbouring building. These obligations include serving advanced notice of works, stating whether the foundations of the adjoining property will be strengthened or safeguarded, and providing plans and sections. Under the Party Wall Act adjoining owners may request the building owner to provide a bond or insurances to provide security in the event of a dispute. Security bonds can be provided either as part of a party wall agreement or as a separate private arrangement between the developer / owner and the neighbour.

165. Security for expenses and party wall agreements are dealt with under separate law and regulations to planning law and should therefore not be included as requirements under planning.
166. In this context it is not for the Council to expect security for expenses or other matters that are dealt with under the Party Wall Act. It is simply not a matter for planning, and the Council has no basis for using its Local Plan to interfere in that separate statutory process.
167. Correctly, information about the Party Wall Act, party wall agreements and matters such as security for expenses can be included in planning documents.

Appendices – supporting evidence

- A. Appendix A. RBKC publication planning policy arboricultural impact – March 2014. Landmark Trees; LT RSP 2 RBKC 34.3.59. 18 March 2014.
- B. Appendix B. Comments on the Royal Borough of Kensington and Chelsea’s draft basements policy. GS Ecology. Ref: ECO1565. 19 March 2014
- C. Appendix C. ASUC Guidelines on safe and efficient basement construction directly below or near to existing structures. 2nd Edition. July 2016.
- D. Appendix D. Ove Arup & Partners Ltd, Royal Borough of Kensington and Chelsea Basements Policy. Hydrologic review of second draft policy for public consultation. 29 April 2013.
- E. Appendix E. Evidence to demonstrate that trees of any size grow healthily to full size on top of garden basements. Association of Specialist Underpinning Contractors (ASUC). 22 June 2025.

Additional material

In our response we have referenced the following additional material. These are documents issued by the Council. Items 1 and 4 can be found on the Council's Draft new Local Plan webpage - <https://www.camden.gov.uk/draft-new-local-plan>

We have included these four documents with our submission for your ease of reference.

1. Item 1. Camden Local Plan 2025 Policy D6 Basements. From Local Plan pages 478 to 483.
<https://www.camden.gov.uk/camden-local-plan1>
2. Item 2. Camden Planning Guidance. Basements. January 2021
<https://www.camden.gov.uk/planning-policy-documents>
3. Item 3. Ove Arup & Partners, Camden geological, hydrogeological and hydrological study. Guidance for subterranean development. Issue01. November 2010. Dated 18/11/10
<https://www.camden.gov.uk/evidence-and-supporting-documents>
4. Item 4. Camden. Regulation 22(1)(c) Consultation Statement. Consultation on the Regulation 18 Draft Camden Local Plan. Summary of Consultation Responses. 615 page pdf. No page numbering. References to the 2010 Arup report are made in the Policy D6 – Basements section, which starts at the bottom of the 548th page of the pdf, including references to the 2010 Arup report on the 555th, 556th, 557th, 558th and 559th pages. <https://www.camden.gov.uk/draft-new-local-plan>