

FAO: Camden Council Planning Policy Team

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

My name is Katie Wolfryd and [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 multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants. This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

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

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

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

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

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

### 4. Access Constraints and Undeliverability

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

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

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

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

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

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

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

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

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

### 7. Better Alternatives Exist

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

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

### Conclusion and Requested Action

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

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

- Chapter 4 Central Camden: Table 5
  - Chapter 7: Meeting Housing Needs: Policy H11
  - Draft Policies Map and Schedule of Proposed Local Plan Site Allocations
- and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,  
Katie Wolfryd

Date: Thu, 26 Jun 2025 13:35:23 +0100

From: [redacted]

To: [redacted]

Subject: Representation on Camden Local Plan Proposed Submission Draft - Paul Harvey

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

I am submitting this response as a local resident with specific concerns about the identification of a potential site at Chalk Farm for gypsy and traveller accommodation. My representation outlines why I believe the Plan, in its current form, is unsound and not fully compliant with national policy or legal requirements, and it includes suggested modifications.

We need affordable housing in Camden. This is not the answer.

Kind regards  
Paul Harvey

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

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

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

Name or Organisation:

**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

H11 Pages  
294-5

Policies Map

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

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

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

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

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

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

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

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

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

I consider the Camden Local Plan Submission Draft to be unsound on the grounds that it is not justified or consistent with national policy in relation to the identification of potential sites for gypsy and traveller accommodation, particularly one near my home.

Firstly, the identification of this site appears to have been made without sufficient local evidence or justification, and there is no clear assessment of site-specific constraints such as access, infrastructure capacity, environmental impact, or compatibility with the existing character of the area. The plan fails the “justified” test under paragraph 35 of the National Planning Policy Framework (NPPF), as it does not demonstrate that this is the most appropriate site when considered against reasonable alternatives, based on proportionate evidence.

Secondly, there appears to have been a lack of meaningful public engagement regarding the inclusion of specific sites at this stage. While the plan is still in draft, the inclusion of sites gives the impression of pre-empting future planning decisions, without the site-specific consultation and scrutiny that would normally accompany a formal application. This

undermines public confidence and suggests a failure to adequately involve the community in shaping the policies that affect them, as required by national policy on plan-making.

Thirdly, it is not clear how the Council has fulfilled its duty to co-operate under Section 33A of the Planning and Compulsory Purchase Act 2004. The identification of specific sites for the gypsy and traveller community requires cross-boundary cooperation to ensure that provision is made strategically, fairly, and proportionately across boroughs. The Draft Plan does not provide enough evidence that Camden has worked constructively or actively with neighbouring authorities on this matter.

For these reasons, I do not believe the plan meets the legal tests of soundness or compliance and should not proceed in its current form.

(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.

To make the Camden Local Plan Proposed Submission Draft sound and legally compliant, the following modifications are necessary:

1. Remove the specific site near Chalk Farm from the list of potential gypsy and traveller accommodation sites unless and until a proper, site-specific assessment is conducted. This should include consideration of access, infrastructure, environmental constraints, local services, and the compatibility of the site with surrounding land use and character. The plan must demonstrate that the site has been selected based on proportionate evidence and reasonable alternatives have been fully considered.
2. Include a transparent and robust methodology for site selection for gypsy and traveller accommodation. The draft plan should explain how sites were identified, what criteria were applied, what evidence underpinned those decisions, and how public consultation shaped the process. This will ensure that the plan meets the "justified" and "effective" tests of soundness under paragraph 35 of the NPPF.
3. Strengthen the section of the plan relating to public engagement and future decision-making, with a commitment that any shortlisted sites are subject to meaningful local consultation before inclusion in the final plan. This would make the process more transparent and inclusive and help rebuild public confidence in planning decisions.
4. Provide evidence of cross-boundary cooperation with neighbouring boroughs specifically in relation to meeting the accommodation needs of the gypsy and traveller community. This is essential to demonstrate compliance with the legal Duty to Cooperate under Section 33A of the Planning and Compulsory Purchase Act 2004.

Without these changes, the plan cannot be considered sound or legally compliant in its current form. These modifications would ensure the Plan is based on proper evidence, respects the rights and concerns of existing communities, and complies with national planning policies.

(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:

I wish to participate in the oral part of the examination because I have serious concerns about the soundness and justification of the proposed inclusion of a site near my home for potential gypsy and traveller accommodation. I believe that only by presenting my concerns in person will I be able to fully explain the local context, highlight deficiencies in the site selection process, and respond directly to any questions or clarifications the Inspector may have. Written representations alone may not fully capture the detailed, site-specific issues or reflect the strength of local feeling on this matter. I am also concerned that without participation, local residents' views may be underrepresented in a process that could have long-term consequences for the community and the integrity of the planning system.

**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 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.

Date: Thu, 26 Jun 2025 12:38:57 +0000

From: Tom Clipson

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

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

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My name is Thomas Clipson and I live at [redacted address], [redacted] (C27 - Land east of Constable House).

I would respectfully request that the Planning Inspector consider removal of site C27 for the following reasons:

### **1. Loss of valued community amenity space**

The site has been wonderfully planted with wildflowers and trees by [Communi-trees](#), the community greening initiative. This project was conceived by the charity [KOKO foundations](#), whose ambassadors include Benedict Cumberbatch, Stormzy, Dua Lipa, Olivia Coleman and more. 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**

Not to mention the very loud and on-going building works adjoining Chalk Farm station and the very busy rank of e-scooter and e-bikes less than a meter away - 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] EWCJ 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 any independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to 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.

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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.**

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
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- 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,

Thomas Clipson



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

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The 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

Ashutosh Parande

Responder 390

Date: Thu, 26 Jun 2025 12:52:14 +0000

From: Tom McLaughlin

To: PlanningPolicy

Subject: Site Allocation C27 - Land East of Constable House, Adelaide House  
(Gypsy and Traveller Site) Of Draft Local Plan

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

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

[REDACTED]

[REDACTED]

Yours faithfully

Tom McLaughlin and

Margaret McLaughlin  
Sent from my iPhone



Date: Thu, 26 Jun 2025 12:56:27 +0000  
From: Chanelle Cattin  
To: PlanningPolicy  
Subject: Gypsy and traveller site proposal

---

I am writing regarding the proposal to allocate the site opposite Constable House on Adelaide Road as a gypsy and traveller site (the "**Proposal**").

As a resident of [REDACTED] I am extremely concerned about the Proposal for three key (albeit related) reasons:

1. Adelaide Road and the surrounding area are currently very clean, peaceful and quiet with limited foot and vehicle traffic. The Proposal will naturally dramatically increase such traffic which will no doubt result in a corresponding increase in noise and disruption.
2. When walking along Adelaide Road by myself, I generally feel safe and confident to be walking alone, and I am happy for my partner to do so as well. This is largely because people do not loiter on Adelaide Road. If pitching is allowed (for gypsies/travellers or anyone at all) right where I walk, I do not believe that I will continue to feel safe in my neighbourhood.
3. More generally, I am of course concerned about the reputation that gypsies/travellers have with respect to adhering to the law.

My partner and I have lived on [redacted] for 3 years and we love the area. It is a beautiful, quiet and safe neighbourhood. We would be very keen to continue to live there and contribute to the local economy. However, in the light of the concerns I have noted above, if the Proposal goes ahead, we will unfortunately move elsewhere.

Best regards  
Chanelle

Date: Thu, 26 Jun 2025 13:02:03 +0000  
From: Mike Priaulx  
To: PlanningPolicy  
Subject: comments - Draft New Camden Local Plan

---

Please find attached the completed representation form,  
on behalf of Camden Swifts Group.

Can you provide acknowledgement that this has been received?

It would be much appreciated.

As I completed this online I could not sign it manually, I trust this is acceptable.  
Any problems at all with this please let me know.

Best regards,  
Mr Michael Priaulx

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

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

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

Name or Organisation: Camden Swifts Group

**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

11.48

Policy

NE2  
Biodiversity  
(A5)

Policies  
Map

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

(1) Legally compliant

Yes

ticked

No

(2) Sound

Yes

No

ticked

(3) Complies with the Duty to co-operate

Yes

ticked

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

ticked

\*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.

Policy NE2 (A5) and 11.48 reference to swifts bricks is welcome, but lack of reference to numbers of swift bricks to be installed means it is not sound as not consistent with national planning policy -

National Planning Policy Guidance (NPPG) 2025 Natural Environment paragraph 017, states "Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit."

<https://www.gov.uk/guidance/natural-environment>

The full text of paragraph 017 is:

"How can developments incorporate features which support priority or threatened species?

The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.

Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.

Paragraph: 017 Reference ID: 8-017-20250609"

(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.

To make the Local Plan sound and consistent with national planning policy, please add the following text from NPPG Natural Environment 2025 paragraph 017 to Policy NE2 (A5):

(NB I have deleted reference to the year of the British Standard from the NPPG text so that the latest version can always be referenced, and also deleted reference to the RSPB Guide to Nestboxes as this only currently covers swift boxes and not swift bricks.)

Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.

Specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021, and the Future Homes Hub Homes for Nature Guidance.

(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:

To provide further information, if required.

**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	ticked
(b) when the Inspector's Report is published	ticked
(c) when the Camden Local Plan is adopted	ticked

**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:	Michael Priaulx	Date:	26/06/25
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

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

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

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

## 3. Soundness

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

### • ***Positively prepared***

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



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: Thu, 26 Jun 2025 14:02:52 +0100

From: Inigo Thomas

To: [redacted], [redacted]

Subject: 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,

---

Dear Councillor and members of the Planning Policy Group.

I write with the hope that the proposal to put forward a parcel of land as a future home for Travellers should be abandoned, and abandoned now. Cllr Adam Harrison has said (in an email to me) that 'the law of the land is such that the council must demonstrate in the local plan where such housing could go.'

But Robert Anderson, the KC at Blackstone Chambers, who has shown me letter he has sent to you, explains in detail how Camden would be breaking its own rules and regulations, as well as the law of the land, if this land is to be considered as a potential new home for Travellers.

I know that you, Anna, have said the proposal to present this idea in the local plan isn't the same thing as giving permission to build. But if this proposal breaks your own regulations and laws, why is it in the Local Plan at all? Surely it better to have this site struck out of the plan now. It won't ever be any less at odds with your own rules, regulations and laws, so it will seem the more peculiar that you kept the idea in the Local Plan proposal.

Thank you,

Inigo Thomas

Responder 394

Date: Thu, 26 Jun 2025 13:03:58 +0000

From: nisha gopalan

To: PlanningPolicy

Subject: Camden council tenant and owner response to Traveler Site proposal

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## Camden Local Plan – Proposed Submission Draft 2025

### Representation Form

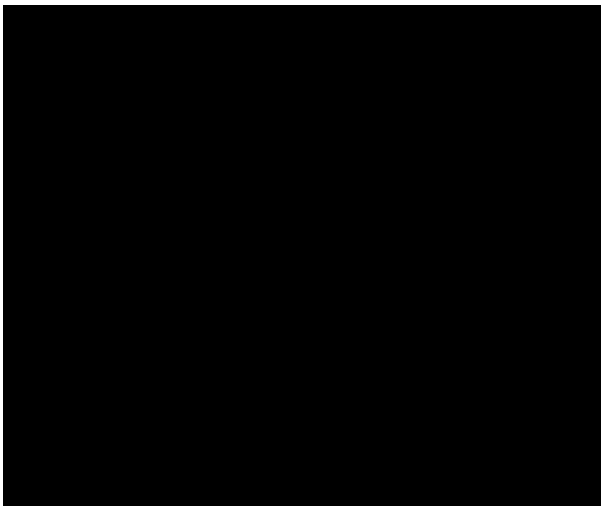
#### Part A – Personal Details

##### 1. Personal Details

Title: Ms

First Name: Nisha

Last Name: Gopalan



#### Part B – Representation

Name or Organisation: Nisha Gopalan / Investopedia

3. Relevant Paragraph/Policy: Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)

4. Do you believe the plan is:

Legally compliant: No

Sound: No

Complies with the Duty to co-operate: Yes

5. Reasons for Unsoundness:

Not positively prepared: Yes

Not justified: Yes

Not effective: Yes

Not consistent with national policy: [Not specified]

## **6. Representation Explanation**

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

### **Legal Compliance Objection**

I wish to formally object to the inclusion of the proposed Traveller site allocation at Land east of Constable House, NW3 3QA within Camden Council's Proposed Submission Draft Local Plan, on the grounds of legal non-compliance with the council's Statement of Community Involvement (SCI).

Specifically, the consultation relating to this proposed site failed to meet the legal standards and principles of proper community engagement as defined in the SCI:

- No in-person or drop-in events were held for residents of Constable House or the surrounding area.
- No physical notifications (letters, flyers, or posters) were delivered to residents.
- No non-English information was made available for residents who do not speak English.

These failures breach the Council's duty to consult in a way that is "visible, accessible, inclusive, and transparent."

As a result, this part of the Plan has not been lawfully prepared.

### **Unsoundness Objection**

I also object to site allocation C27 on the grounds of unsoundness:

- The site is not positively prepared and does not realistically meet Traveller accommodation needs.
- It is not justified, with no clear evidence base or technical assessments.
- It is not effective, given its constraints and strong community opposition.

The site is unlikely to be deliverable and should not be included.

## **7. Suggested Modifications**

The proposed site allocation at Land east of Constable House (C27) (NW3 3QA) should be removed from the Plan.

Camden should reassess alternative sites using a transparent, evidence-based process, with proper consultation.

## **8. Participation at Oral Examination**

Do you wish to participate: No

## **10. Consultation Notifications**

✓ When the Camden Local Plan has been submitted

✓ When the Inspector's Report is published

✓ When the Camden Local Plan is adopted

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

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



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

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

Name or Organisation: SIMON KAIRBRASS

**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

No

(2) Sound

Yes

No

(3) Complies with the Duty to co-operate

Yes

No

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

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

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

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

(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.

- Increased crowding in an extremely busy area due to Road layout and Chalk Farm Tube
- overlooking / Noise increase for Carstable House gardens
- Loss of visual amenity for residents in area of limited green cover



- Access would reduce parking and/or lead to significant tree removal

(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.

- Different location

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

**Privacy Notice**

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

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

11. Signature:	<div></div>	Date:	26/6/25
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Date: Thu, 26 Jun 2025 13:29:14 +0000  
From: Gillian Dobias  
To: PlanningPolicy  
Subject: Camden Travellers & Gypsy site application

---

Re: Site Allocation C27 - Resident objection

I am abroad so unfortunately am not able to download the official form to lodge my objection to the proposed travellers and gypsy site in Camden. Therefor I am writing this email.

I feel it is discriminatory to assign Camden Council land to any one group of people. [redacted]

[redacted] It is discriminatory to the homeless who are in need of homes but don't happen to be gypsies or travellers. It will ghettoise the community.

I do hope my complaint will be registered as this planning application was not widely shared with the community in advance of tomorrow's deadline. I only found out about this yesterday.

Gillian

--

**Gillian Dobias**  
**[redacted address].** [redacted]  
[redacted]

Date: Thu, 26 Jun 2025 13:29:50 +0000  
From: Daniel Braun  
To: PlanningPolicy  
Subject: Objection to Proposed Allocation of Site C27 – Land East of Constable House

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

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

Dear Camden Council Planning Policy Team,

My name is Daniel Braun, and I live at [redacted address]. I'm a long-standing Camden resident and a practising lawyer, and I'm writing to strongly object to the proposed allocation of Site C27 - Land East of Constable House - as a Gypsy and Traveller site under the draft Camden Local Plan.

I fully support Camden's responsibility to identify suitable accommodation for Gypsy and Traveller families, but this site is simply not appropriate or fair for anyone to live on.

Site C27 is located in an extremely busy pedestrian corridor near Chalk Farm station and the walking route to Primrose Hill. It is directly adjacent to scooter, bike, and Zipcar bays that operate at all hours. The noise, foot traffic, and lack of privacy make it entirely unsuitable as a long-term residential space.

There are also very real safety concerns: the site is hemmed in by narrow roads and congested areas, which would make access by emergency vehicles difficult at best.

Moreover, the community only became aware of this proposed allocation recently. Site C27 was not included in previous consultation rounds, undermining transparency and trust in the planning process. That lack of engagement with local residents is a significant procedural failure.

This site also has symbolic and community value. Young people recently transformed it through the CommuniTrees project, planting fruit trees and wildflowers to create a small space of hope and connection. That project would be entirely erased if the development proceeds - a loss both environmentally and socially.

Camden deserves thoughtful planning that balances need with dignity, suitability, and transparency. Site C27 fails to meet that standard. I respectfully urge you to reconsider and remove this site from the proposed plan.

I am writing to object to this proposed traveller site in a residential area. It will disturb the residents' quiet enjoyment of their housing. It is also too small a site for its intended purpose

Secondly, it is inappropriate because it is very near 3 churches, a nursery school and a secondary school.

L. Johnson



Date: Thu, 26 Jun 2025 13:33:07 +0000  
From: Planning  
To: PlanningPolicy  
Subject: FW: Draft Local Plan - Objection to Site Allocation C27 (Gypsy and Traveller Site)

---

To Camden Council Planning Policy,

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

My name is Rosanne Shamash, and I live in [redacted].

I 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 ask that the Planning Inspector recommend the removal of the Site C27 from the Plan, on the basis that its allocation is unsound for the following reasons:

1. Loss of Valued Community Space. We need more amenities, and not accommodation or housing. There are already several flats which have been built/are being built for housing purposes, and the area simply can't cope with more people. Why has this particular location been recommended for use by travellers and gypsies, when this site can be used for outdoor space and recreation, or local amenities?
2. Flood Risk - traveller pitches are at risk of causing damage to the area
3. Choice of Location - The area is residential, and why does Camden think that this particular site is suitable, as there are several buildings within proximity, and this would cause more over-crowding of the area, especially when I use Chalk Farm tube station and the 31 bus.

In conclusion, this site does not seem appropriate to accommodate for travellers and gypsies.

Would it be possible for Camden Council to please consider using an alternative location, and also provide transparency to a community-informed process please?

Kind regards,

Rosanne

[redacted address]

[redacted] [redacted postcode]

Date: Thu, 26 Jun 2025 13:45:59 +0000  
From: NG Planning  
To: PlanningPolicy  
Subject: Camden Submission Version Local Plan Consultation NGET Response

---

Dear Sir / Madam,

**Camden Submission Version Local Plan Consultation May-June 2025**

**Representations on behalf of National Grid Electricity Transmission (NGET)**

National Grid Electricity Transmission (NGET) has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the attached representation with regard to the current consultation on the above document.

If you require any further information in respect of this letter, then please contact us.

With Kind regards

Andrew

26 June 2025

Camden London Borough Council  
[planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
 via email only

Dear Sir /Madam,

## Camden Submission Version Local Plan Consultation May-June 2025 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

### Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site	Asset Description
C12 Gilbeys Yard	Cable: CITR4 - SJOW4 1 CABLE SECT 06 Route: CITY ROAD - ST JOHNS WOOD 1 and CITR4 - SJOW4 2 CABLE SECT 06 Route: CITY ROAD - ST JOHNS WOOD 2



C16 Shirley House	Cable: CITR4 - SJOW4 2 CABLE SECT 08 Route: CITY ROAD - ST JOHNS WOOD 2 and CITR4 - SJOW4 1 CABLE SECT 08 Route: CITY ROAD - ST JOHNS WOOD 1
-------------------	--

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.

We propose modifications to each of the above site allocation policies to include wording to the following effect.

*"The development will include a strategy for responding to the NGET underground Cable Route present within/adjacent to the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage, how the impact of the assets on proposals has been reduced and any risk from development to NGET assets averted, through good design"*

We therefore **object** to the document until wording to this effect is included.

## New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

## Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Angela Brooks MRTPI, Partner**



**Tiffany Bates, Development Liaison Officer**



If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Angela Brooks**



For and on behalf of Fisher German LLP

### Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.


NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

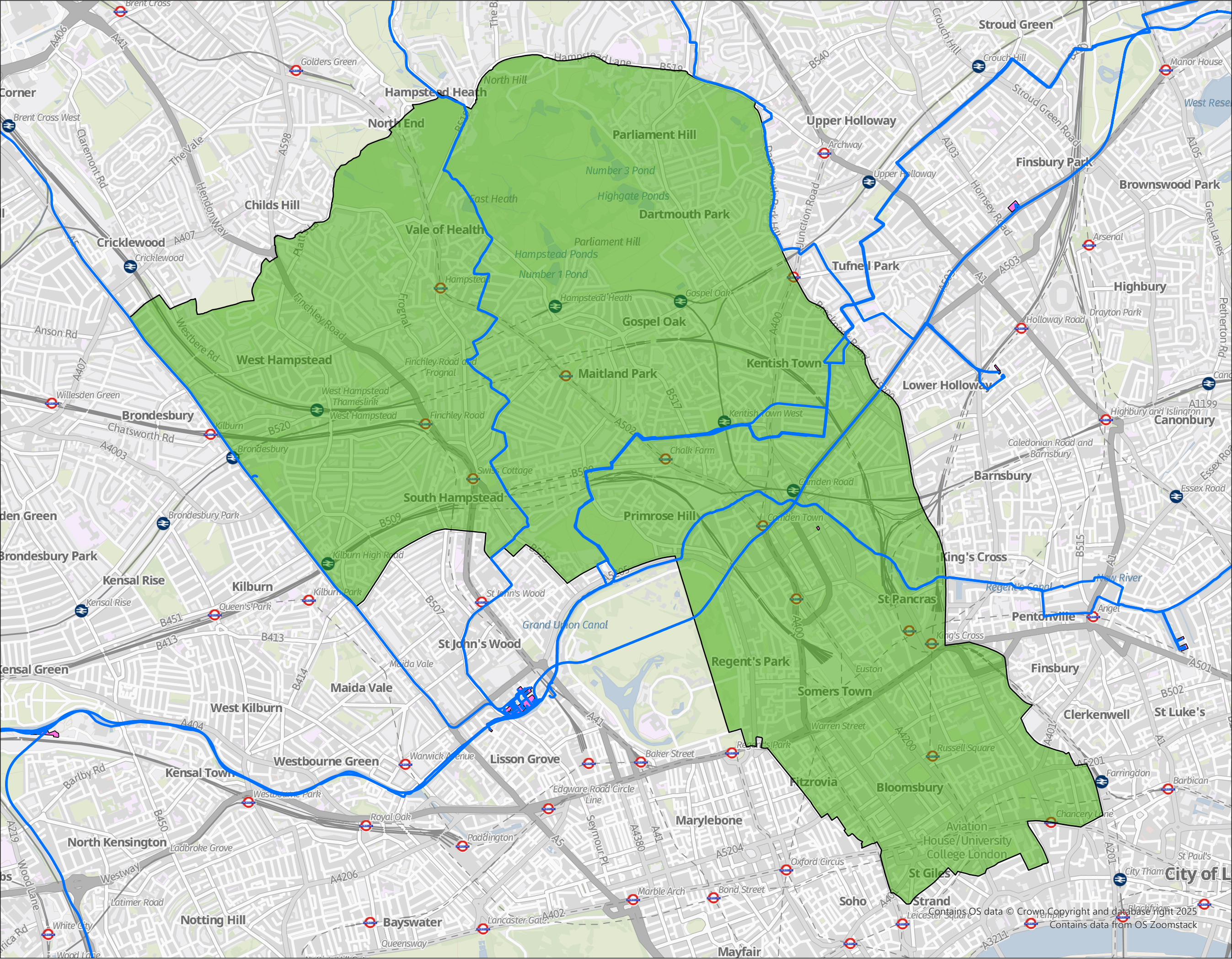
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: 





0 0.25 0.5 1  
Kilometers

OVERVIEW WINDOW

LEGEND:

- Cable
- OHL
- Substation
- LPA Area

REVISION: A  
CLIENT: **nationalgrid**

SCHEME:  
PLANNING INTERACTION

TITLE:  
LPA ASSET INTERACTION

FP: 105181-024  
SCALE: 1:27,000 @ A3  
DATE: 20/05/2025

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**fisher  
german**

The Estates Office, Norman Court  
Ashby de la Zouch,  
Leicestershire, LE65 2UZ  
01530 412821  
fishergerman.co.uk

DRAWING REF:  
NG-2025-03-MT-OP-LPA- Camden

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planningpolicy@camden.gov.uk

Our Ref

Thursday 26 June 2025

Dear Planning Policy Team,

**Camden Local Plan Proposed Submission Draft consultation – Reg 19**

Thank you for your consultation on this document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Towpath use

Within LB Camden the Canal & River Trust owns and manages the Regent's Canal and its towpath. The Trust operates a towpath counter at Gloucester Avenue within LB Camden, and in 2023, this recorded an average daily count of 3,564 passers-by. This made it the 6<sup>th</sup> busiest towpath counter that we have on our national network (Armouries Way in Leeds was the busiest, as well as some other locations in London such as Millwall Dock, plus others in central Manchester and Birmingham). This was up from a recorded 3,360 passers-by in 2022, when it the 9<sup>th</sup> busiest towpath counter on our national network (Paddington Basin being the busiest in 2022). This demonstrates how valuable the Regent's Canal is as a walking, cycling and amenity resource to Camden's visitors and residents.

Camden heritage

A few heritage facts about the Regent's Canal in LB Camden:

- Of the 8.9-mile total length of the Regent's Canal, 1.7 miles (18.7%) lie within the LB of Camden.
- Of the Regent's Canal's twelve locks between Little Venice and Limehouse Basin, four are located within the LB of Camden.
- Of the Regent's Canal's total fall of 26.1m between Little Venice and Limehouse Basin, 11.9m (45.6%) occurs within the LB of Camden.
- The twelve locks were built as paired chambers to enhance navigation capacity and to conserve water. All locks except Hampstead Road had one of their chambers converted to a weir in 1973-6.
- LB Camden played a significant part in the development of 'Canalway' in the 1970s and 1980s, an initiative in. More information can be found here: <https://londoncanals.uk/940/>

**Canal & River Trust Spatial Planning Team**

We have the following specific comments to make on the draft Local Plan:

The waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the borough of Camden.

Please find below the Trust's response to this draft Local Plan. We hope that the comments provided are clear and helpful and that your next revision will address these points. We are willing to continue to work with you, to meet and discuss these points for clarity and to seek to work together towards a high-quality borough that relates positively with the waterway network.

#### Regent's Canal Conservation Area Appraisal

As we previously commented, we note that the Regent's Canal Conservation Area Appraisal (2008) is referenced within Site Allocation C15 (IDS5) – Shirley House, as well as at paragraph 11.13 regarding 'Key open spaces in Camden'. The document includes quite a few recommendations for canalside development and could be a useful reference for developers and decision makers, but we note it is out of date with respect to developments at King's Cross and Camden Market, and also British Waterways' transfer to the Canal & River Trust. We would be pleased to work with LB Camden to update this document, as well as the Primrose Hill Conservation Area Statement (2001) which includes reference to the Regent's Canal, but not the Trust.

#### Site Allocations

We note that our Reg 18 comments regarding canal towpath and access improvements have not been added to any site allocations, but are included more generally in environment and transport policies (p425 – Policy NE1: 7, Policy T6 A.1, p535 – para 14.61). There is reference to development contributing to new and improved bridges over the Regent's Canal, but not to improvements to the towpath itself.

#### Allocation 16: Shirley House and Allocation 10: Bangor Wharf

While we are pleased to note the reference to moorings ("Development must: 6. consider the provision of infrastructure for canal moorings alongside the site.") the Trust would require an Operating Proposal be submitted by any developer seeking to implement this, to assess the plans and review navigational safety and sight lines. The requirement for new moorings are available on our web page:

<https://canalrivertrust.org.uk/business-and-trade/business-boating/starting-or-expanding-a-boating-business/marinas-and-moorings> .

#### Housing provision and residential moorings – page 249

We are pleased to note the support for residential mooring delivery in Policy H6 Housing Choice and Mix. For clarity we would suggest this be slightly amended to read "and 8. support the creation of additional residential moorings in conjunction with the development of sites adjacent to the Regent's Canal where this is consistent with optimising the use and development potential of the site, the protection and enhancement of the Canal's biodiversity and nature conservation value, the Canal's open space designation, the historic interest and character of the Regent's Canal Conservation Area, and the **Canal & River Trust's** London Mooring Strategy."

#### Canal & River Trust Spatial Planning Team

E: [planning@canalrivertrust.org.uk](mailto:planning@canalrivertrust.org.uk) W: [canalrivertrust.org.uk](http://canalrivertrust.org.uk) T: 0303 040 4040

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

**Claire McLean MRTPI**  
Area Planner London

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

**Canal & River Trust Spatial Planning Team**

**E:** [planning@canalrivertrust.org.uk](mailto:planning@canalrivertrust.org.uk) **W:** [canalrivertrust.org.uk](https://canalrivertrust.org.uk) **T:** 0303 040 4040

Patron: King Charles III. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

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

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

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

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

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

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



#### 4. Access Constraints and Undeliverability

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

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

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

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

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

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

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

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

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

#### 7. Better Alternatives Exist

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

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

#### Conclusion and Requested Action

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

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

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

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

Regards, Sarah Curl 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](mailto:planningpolicy@camden.gov.uk)

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

Title	<input type="text" value="Miss"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Cooper"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
Organisation	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

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

Name or Organisation: Structural Repairs & Specialist Services LTD

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

Documents can be found at the following links:

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

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

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

(1) Legally compliant	Yes	<input type="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

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.

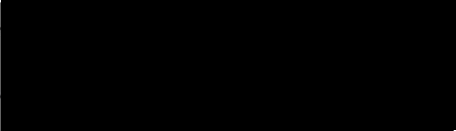
(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

**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 <sup>th</sup> June 2025
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

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





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

Thursday 26<sup>th</sup> June 2025

Dear Sir/Madam

**DRAFT NEW CAMDEN LOCAL PLAN REGULATION 19 - SUBMISSION OF REPRESENTATIONS ON BEHALF OF THE UNIVERSITY OF LONDON**

On behalf of our client, University of London, we are writing to provide comments in response to the Council's consultation of the Regulation 19 version of the Draft Local Plan. We have set out below a summary of the main points. Full detail and revised wording and changes proposed is set out in the attached schedule.

As set out within the representation submitted in respect to the Reg 18 consultation, the University of London's core purpose is to increase access to education, champion research excellence and deliver social good. They work in partnership with the University of London federation members, 17 higher education institutions across the London area. Currently around 40,000 students around the world are studying through the University of London. They also support several of the federation members who are located in the Bloomsbury / Camden area through their ownership and active management of the local estate.

One of the key strategic objectives for the University of London is to 'develop and continuously adapt our organisation and capacity to anticipate the university of the future'. The University Estate Strategy outlines how the University will develop and improve the estate and outlines routes to help realise the commercial value of the estate for the benefit of the University of London and its federation members.

The University of London's physical estate includes a wide range of buildings and facilities as well as areas of open space and amenity. A large proportion of the University of London's estate is located within the Bloomsbury Campus Area, which contains a large number of university-related buildings and activities and is the heart of the higher education facilities within Camden.

The University of London previously provided representations on the Regulation 18 draft of the Local Plan, suggesting amendments in wording to a number of policies, to provide greater certainty and clarity where needed, and more flexibility in other circumstances. This representation therefore follows the publishing of the regulation 19 pre-submission draft, taking into account the previous representations and the Council's subsequent response.

Camden Draft Local Plan contains a number of policies which are relevant to the University of London and the estate they manage. It is important that these policies provide sufficient support and flexibility to allow the University to achieve their own aims and aspirations in relation to teaching, learning and research, and support those of the federation members now and in the decades to come.



The following paragraphs set out our comments on the Draft Camden Local Plan on behalf of the University of London. Appendix 1 (policy matrix) is submitted alongside this letter which sets out the suggested wording amendments (where appropriate) to the policies that we have commented on below.

**Bloomsbury Campus Area (Draft Policy S4)**

The University of London continues to be supportive of Draft Policy S1 (South Camden) which outlines support for the Bloomsbury Campus Area, to maintain and expand its role as the heart of higher education facilities on Camden.

In regard to draft Policy S4, the University of London continue to consider it necessary to be more precise in the wording of some of the policy.

The University of London do not need to increase academic space within the Bloomsbury Campus Area given the changes in working since the Covid-19 pandemic and the ability of employees to undertake academic and administrative work elsewhere. Instead, the quality of existing facilities needs to be improved and/or new high-quality academic and supporting office space needs to be provided, allowing the existing facilities to be converted into other appropriate uses. Draft policy S4 should be amended to expressly support the conversion of existing facilities and the creation of new high-quality academic and supporting office spaces.

**Purpose-built student accommodation (Draft Policy H9)**

Draft Policy H9 is relevant for the University of London as they are currently experiencing a shortage of student accommodation within proximity to the Bloomsbury Campus. The University therefore considers there to be a significant demand for student accommodation within South Camden, and in the Bloomsbury Campus Area in particular.

The draft policy sets out a target of 200 additional places in student housing per year, stating that the Council will look to meet or exceed this target. The target is however based on London Plan evidence base from 2017 (with a minor update in 2018), which is likely to be significantly out of date. We understand that the new London Plan is currently being prepared, and an updated student’s needs assessment is expected to be published this Autumn as part of the evidence base. In our view, it is likely to identify an increase in demand for student accommodation given the lack of delivery over the previous 5 years. The draft Camden Local Plan should therefore take account of the updated student need assessment when published and set out a higher target for Camden.

According to the HESA Student Record (2021/2022) Camden had the second largest number of students in Greater London, with 68,500 full-time students studying within the Borough. This is only surpassed by Westminster who has 86,000 full-time students studying within the Borough. 59% of full-time students study in in four boroughs (Camden, Westminster, Islington and Tower Hamlets), but the same proportion of students live across 13 boroughs. This highlights the undersupply of student accommodation in the borough. Tower Hamlets and Camden are the London borough with the highest number of full-time students living in them, with 25,000 students in Camden. The below chart highlights this imbalance between where students live and study.



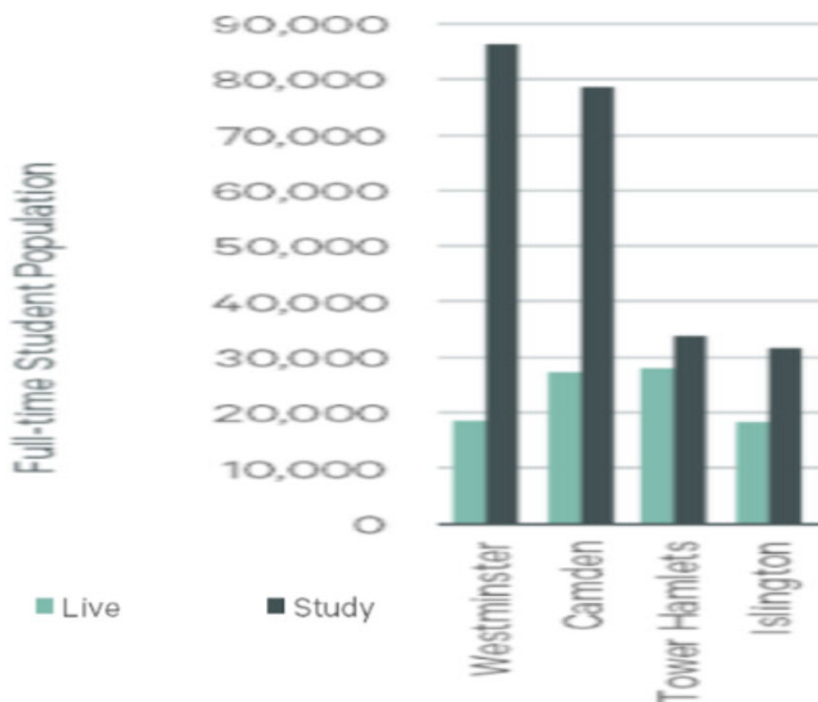


Figure 1 - full-time student population live and study location, based on borough

Based on the most current available student population data, analysis shows there could be a demand pool of up to 201,530 full-time students who may want student accommodation in London. In 2023/2024, the supply of beds in London was estimated to be 100,156 which only accounts for 50% of the total demand pool, leaving a significant undersupply of student accommodation within London, which Camden has a significant share of. This places pressure on Camden’s housing market. Based on 2021/22 HESA student data and the known operational PBSA beds in 2023/24, there is a potential unmet demand of approximately 75,976 full-time students at the universities in the federation who could potentially require, but not be able to access, PBSA. There are several schemes with consent to develop which either have support of or are being undertaken by a member institution. In the event of the entire pipeline of these schemes being built out, the unmet demand would still stand at almost 69,900 full time students. Additionally, any future student growth could contribute directly to unmet demand increasing the demand for housing. Consequently, the provision of new PBSA schemes within Camden will help to release self-contained housing currently being used as student accommodation.

The University of London currently has 3,624 bed spaces, across 9 schemes, and is committed to providing circa 2,500 additional bedspaces within the Borough and the Bloomsbury Campus Area, but needs specific policy support to deliver additional spaces. Firstly, through an updated and higher target for student bedspaces within the Borough, and secondly through the provision of a specific target for the Bloomsbury Campus Area, given that a significant amount of the student housing provision is likely to come from within this area. Inclusion of a target would safeguard the delivery of student housing in this appropriate location, rather than allowing it to be dispersed into locations which may be further from the area in which there is demand.



It is acknowledged that the draft policy allows for exceeding the target, however it is likely that this will be resisted given the Council’s priority is for ‘permanent self-contained housing’ - when the updated evidence base of the London Plan is likely to confirm a greater need than 200 additional places.

In addition, from reviewing the Consultation Statement it is evident that there is some hostility to student accommodation in certain locations, such as Somers Town, this may partly be for the reason that there is not an academic presence in this location compared to the Bloomsbury Campus Area where student accommodation is more appropriate.

The sensitivity of the Bloomsbury Campus Area, in terms of the concentration of listed buildings and other heritage assets, needs to be acknowledged in relation to delivering student accommodation in the appropriate location. The draft policy should acknowledge these considerations and that significant weight should be afforded to the need for this type of housing.

**Summary**

In summary, the University of London expresses general support for the policies of the Draft Local Plan as discussed within this letter however, it is important that the Council’s evidence base is kept up to date to ensure that the draft policies align with the University’s strategic objectives as a key higher education provider in London.

Moreover, it is essential for the draft policies to align with the changing needs of the University and its federation members in a post-COVID landscape. Consequently, there should be flexibility in the policy wording to facilitate potential, viable alternative uses of our current property portfolio in the future.

If you have any queries in relation to the representations made on behalf of the University of London, please do not hesitate to contact myself or my colleague Matthew Pearce.

Yours sincerely

**Nick Belsten**

## Reg 19 Camden Local Plan Schedule - Comparison of proposed amendments to wording at Reg 18 stage and Reg 19 draft wording

Topic	Draft New Camden Local Plan (Reg 18)	Reg 18 suggested changes	Reg 19 suggested changes
Bloomsbury Campus Area (Draft Policy S4 - previously S3)	<p>Part A - The Plan's objectives for the Bloomsbury Campus Area are that it should:</p> <ul style="list-style-type: none"> <li>i. Maintain and expand its role as the heart of higher education in Camden;</li> <li>ii. Provide attractive and stimulating spaces for learning, research, sharing ideas, socialising, and supporting students; and</li> </ul> <p>Feel welcoming and inclusive to students, workers, residents and visitors.</p> <p>Part B. The Plan's priorities for development in the Campus Area are to:</p> <ul style="list-style-type: none"> <li>i. Consolidate and increase academic space (including student support facilities and other ancillary space) in a way that celebrates the Universities' achievements and creativity and supports the Plan's other priorities for the Campus Area.</li> </ul> <p>Part C. Where higher education development is proposed in the Campus Area for the University of London or its member institutions, the Council will not require the inclusion of self-contained homes provided the development is publicly funded or serves a public purpose. We will support the development of student housing in the Campus Area to serve the University of London or its member institutions where it will not compromise meeting the need for additional academic space.</p> <p>3.24 Consequently, the Council will also support development to meet higher education needs elsewhere in the Knowledge Quarter and in other parts of the borough, subject to compliance with relevant development plan policies and any other relevant material considerations.</p> <p>3.25 . The second objective of Policy S3 is therefore concerned with providing places that meet student needs.</p> <p>3.33 Consequently, Policy S3 indicates that in specific circumstances we will not seek the inclusion of self-contained homes as part of development in the area.</p> <p>3.34 Additional student housing would benefit the Area by increasing its sustainability and the levels of out-of-hours activity. These benefits do not outweigh the high priority we give to academic facilities for the University of London, however Policy S3 indicates that we will support proposals for student housing in specific circumstances provided academic needs can also be met. Where these circumstances apply, we will also support suitable mixed-use proposals for academic space and student housing.</p>	<p>Part B (i)</p> <p><del>Consolidate and increase academic space</del> <b>Improve the quality of existing academic and supporting office space and/or provide new high quality academic and supporting office space</b> (including student support facilities and other ancillary space) in a way that celebrates the Universities' achievements and creativity and supports the Plan's other priorities for the Campus Area.</p> <p>Part C. Where higher education development <b>(including ancillary office floorspace)</b> is proposed in the Campus Area for the University of London or its member institutions, the Council will not require the inclusion of self-contained homes provided the development is publicly funded or serves a public purpose. We will support the development of student housing in the Campus Area to serve the University of London or its member institutions where it will not compromise meeting the need for additional academic space.</p> <p>3.34 Additional <b>accessible</b> student housing, <b>designed for connectivity to green spaces and using a place-based approach</b> would benefit the Area by increasing its sustainability and the levels of out-of-hours activity. These benefits do not outweigh the high priority we give to academic facilities for the University of London, however Policy S3 indicates that we will support proposals for student housing in specific circumstances provided academic needs can also be met. Where these circumstances apply, we will also support suitable mixed-use proposals for academic space and student housing.</p>	<p>Part A (4)</p> <p><del>consolidate and increase academic space</del> <b>allow for the consolidation of and improvement to the quality of existing academic and supporting space and/or provide new high-quality academic and supporting office space</b> (including student support facilities and other ancillary space) <b>freeing up existing facilities, including historic buildings which are no longer appropriate for such use, for conversion to other appropriate uses</b> in a way that celebrates the Universities' achievements and creativity and supports the Plan's other priorities for the Campus Area;</p>

Purpose-built student accommodation (draft Policy H9)	n/a	n/a	<p>Part B</p> <p>The Council will seek a supply of student housing to meet or exceed Camden's target of <del>200</del> (insert updated target based on new London Plan evidence base) additional places in student housing per year, with a significant proportion being located in the most suitable locations including the Bloomsbury Campus Area (as defined by Policy S4) and will support the development of student housing provided that the development</p>
Maximising the supply of self-contained housing from mixed use scheme (Draft Policy H2)	<p>Council will support the aims of Policy H1 by promoting the inclusion of permanent self-contained homes as part of a mix of uses.</p> <p>Part B - In the defined South Camden sub-area and the town centres of Camden Town and Finchley Road/ Swiss Cottage, we will expect a contribution to permanent self-contained housing from all developments that provide additional non-residential floorspace and involve additional floorspace of 200sqm (GIA) or more. The Council will seek to negotiate the contribution to permanent self-contained housing on the following basis:</p> <ul style="list-style-type: none"> <li>i. a self-contained housing target of 50% is applied to all additional floorspace proposed (GIA);</li> <li>ii. the target is not applied to development in the defined Hatton Garden area provided that an equivalent contribution to jewellery workspace is provided in place of self-contained housing;</li> <li>iii. the target is not applied to development (or parts of development) which are publicly funded or otherwise serve a public purpose provided that the public purpose is secured for a reasonable period;</li> <li>iv. the target is applied to additional floorspace proposed, not to existing floorspace or replacement floorspace;</li> <li>v. the target is sub-divided to provide an affordable housing target and a market housing target on the basis of Policy H4;</li> <li>vi. for developments involving an additional floorspace of at least 200sqm (GIA) but less than 1,000 sqm (GIA), we will seek on-site delivery of self-contained housing, but will have regard to the criteria in Parts B and C of this policy, and provide flexibility for off-site delivery where on-site delivery would demonstrably and unavoidably result in housing or non-residential floorspace of unsatisfactory quality;</li> <li>vii. for developments involving an additional floorspace of 1,000sqm (GIA) or more, self-contained housing should be provided on site, subject to the criteria in Parts B and C;</li> <li>viii. for developments involving an additional floorspace of 2,000sqm (GIA) or more, affordable housing should be provided on site, subject to the provisions of Policy H4;</li> <li>ix. where the self-contained housing target cannot be met in full, we will prioritise the on-site delivery of affordable housing;</li> </ul>	<p>Camden sub-area.</p> <p>7.38 We will not seek a contribution from those elements of a development that are publicly funded or otherwise serve a public purpose, such as hospitals, educational, medical and research institutions (including ancillary office floorspace), and transport infrastructure and facilities. We recognise that the nature of public funding may preclude development to serve other purposes, the sites available to the public purse are often too constrained to provide space for other uses, and the nature of some public services will not be compatible with housing (e.g. 24 hour activity and movements serving a hospital).</p> <p>None of the proposed changes have been incorporated into the Reg 19 version of the Draft Local Plan.</p>	<p>No changes proposed</p>

	<p>where self-contained housing cannot practically be provided on site, or off site provision would create a better contribution (in terms of quantity, quality and/ or affordability), the Council may accept provision of self-contained housing off site in the same area, or exceptionally a payment-in lieu.</p> <p>7.36 No contribution is sought from developments involving additional floorspace of 200sqm (GIA or gross internal area) or less. This threshold is based on the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development.</p> <p>7.38 We will not seek a contribution from those elements of a development that are publicly funded or otherwise serve a public purpose, such as hospitals, educational, medical and research institutions, and transport infrastructure and facilities. We recognise that the nature of public funding may preclude development to serve other purposes, the sites available to the public purse are often too constrained to provide space for other uses, and the nature of some public services will not be compatible with housing (e.g. 24 hour activity and movements serving a hospital).</p> <p>7.40 We recognise that where the additional floorspace proposed is less than 1,000 sqm GIA, given the need to accommodate separate access lobbies, stairs and lifts, maintain existing ground floor activity, provide an efficient layout, and provide a satisfactory standard of residential amenity, it may be difficult to accommodate a contribution to housing on-site. Consequently, for schemes of this scale, we will provide flexibility for off-site contributions where on-site provision would demonstrably compromise the quality of the space.</p> <p>However, we will expect larger schemes to provide on-site contributions to self-contained housing. In all cases, we will have regard to the full set of criteria in Parts B and C of this policy.</p>		
Offices (Draft Policy IE2)	<p>9.31. However, it is recognised that there has been a permanent shift towards greater working from home with employees in some sectors attending the workplace less frequently. As part of the UK's transition to net zero, there is an onus on landowners to upgrade (even relatively recently built) office buildings to meet tighter energy efficiency requirements. While there is a growing market for these 'retrofit' projects, it is likely that some office buildings cannot be upgraded at a reasonable cost.</p> <p>9.32. The policy seeks to retain office floorspace where it can continue to meet an economic need whilst providing flexible for conversion to permanent self-contained housing (the Local Plan's priority use) where there is clear evidence this is no longer possible. The conversion of large office buildings may in some cases provide an opportunity to improve local access to smaller, flexible accommodation for start-ups and SMEs, particularly affordable workspace.</p> <p>Part A - . The Council will manage and protect the stock of offices in the borough to ensure that suitable and viable</p>	<p>9.31. However, it is recognised that there has been a permanent shift towards greater working from home with employees in some sectors attending the workplace less frequently. As part of the UK's transition to net zero, there is an onus on landowners to upgrade (even relatively recently built) office buildings to meet tighter energy efficiency requirements. While there is a growing market for these 'retrofit' projects, it is likely that some office buildings cannot be upgraded at a reasonable cost. <b>Interventions which improve fabric efficiency and energy efficiency will be supported.</b></p> <p>9.32. The policy seeks to retain office floorspace <b>(including ancillary office floorspace relating to educational facilities)</b> where it can continue to meet an economic need whilst providing flexibility for conversion to permanent self- contained housing (the Local Plan's priority use) where there is clear evidence this is no longer possible.</p> <p>Part A - The Council will manage and protect the stock of offices <b>(including ancillary office floorspace relating to educational facilities)</b> in the borough to ensure that suitable and viable</p>	No changes proposed



	<p>accommodation is retained, and that businesses, residents and social enterprises are able to access workspaces that meet their requirements. This includes ensuring a sufficient supply of space for research and development uses. The Council will:</p> <p>9.36 As a minimum, the marketing should be conducted over a 12-month period and by at least two agents with knowledge of the local property markets. Robust evidence should be submitted in line with the detailed approach set out in Camden Planning Guidance on Employment Sites and Business Premises, including verification of online marketing undertaken.</p>	<p>accommodation is retained, and that businesses, residents and social enterprises are able to access workspaces that meet their requirements. This includes ensuring a sufficient supply of space for research and development uses.</p> <p><del>9.36 As a minimum, the marketing should be conducted over a 12-month period and by at least two agents with knowledge of the local property markets.</del> Robust evidence should be submitted in line with the detailed approach set out in Camden Planning Guidance on Employment Sites and Business Premises, including verification of online marketing undertaken. <b>This evidence may include an appropriate period of marketing.</b></p>	
Heritage (Draft Policy D5)	<p>Part E - The Council will support proposals to adapt and improve listed buildings, and buildings within conservation areas, to reduce energy demand, mitigate the impacts of climate change and ensure they are adaptable to a changing climate provided they do not cause significant harm to the special historic or architectural interest of the heritage asset. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will weigh that harm against the public benefits of the proposal, giving significant weight to measures that respond to the climate emergency in a sensitive manner.</p> <p>12.81 - Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.</p>	<p>Part E - The Council will support proposals to adapt and improve listed buildings, and buildings within conservation areas, to reduce energy demand, <b>strengthen resilience</b>, mitigate the impacts of climate change and ensure they are adaptable to a changing climate provided they do not cause significant harm to the special historic or architectural interest of the heritage asset. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will weigh that harm against the public benefits of the proposal, giving significant weight to measures that respond to the climate emergency in a sensitive manner.</p> <p><b>Part F - The Council will support proposals which seek to provide the optimum viable use to secure the retention of listed buildings.</b></p>	No changes proposed

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

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



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

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

Name or Organisation: University of London

**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

Policy S4

Policies Map

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

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

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

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

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

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

*The University of London continues to be supportive of Draft Policy S1 (South Camden) which outlines support for the Bloomsbury Campus Area, to maintain and expand its role as the heart of higher education facilities on Camden.*

*In regard to draft Policy S4, the University of London continue to consider it necessary to be more precise in the wording of some of the policy.*

*The University of London do not need to increase academic space within the Bloomsbury Campus Area given the changes in working since the Covid-19 pandemic and the ability of employees to undertake academic and administrative work elsewhere. Instead, the quality of existing facilities needs to be improved and/or new high quality academic and supporting office space needs to be provided, allowing the existing facilities to be converted into other appropriate uses. Draft policy S4 should be amended to expressly support the conversion of existing facilities and the creation of new high-quality academic and supporting office spaces.*

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.

*Part A (4)*

*consolidate and increase academic space **allow for the consolidation of and improvement to the quality of existing academic and supporting space and/or provide new high-quality academic and supporting office space** (including student support facilities and other ancillary space) **freeing up existing facilities, including historic buildings which are no longer appropriate for such use, for conversion to other appropriate uses** in a way that celebrates the Universities' achievements and creativity and supports the Plan's other priorities for the Campus Area;*

**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

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

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(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

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<b>11. Signature:</b>	<b>N Belsten</b> 	<b>Date:</b>	<b>26.06.2025</b>
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# Notes to accompany the Representation Form

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- ***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.

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- 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?

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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.

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

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

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

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

Name or Organisation: University of London

**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

Policy H9

Policies Map

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

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

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

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

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

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

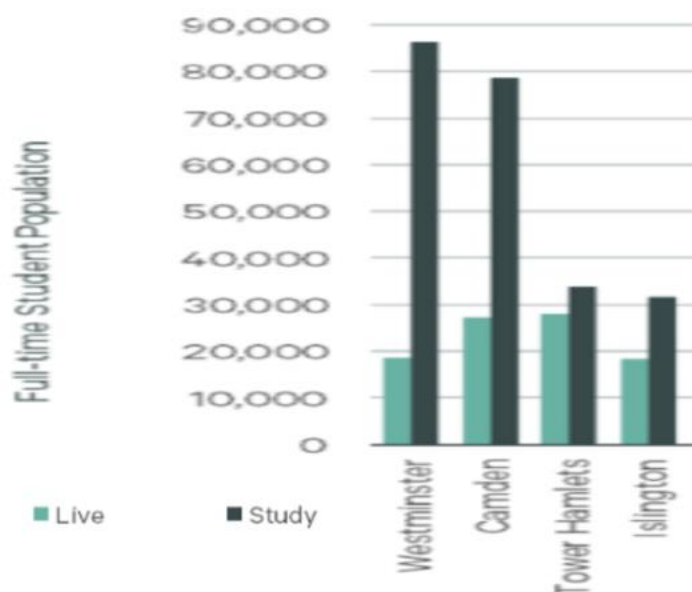
If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

*Draft Policy H9 is relevant for the University of London as they are currently experiencing a shortage of student accommodation within proximity to the Bloomsbury Campus. The University therefore considers there to be a significant demand for student accommodation within South Camden, and in the Bloomsbury Campus Area in particular.*

*The draft policy sets out a target of 200 additional places in student housing per year, stating that the Council will look to meet or exceed this target. The target is however based on London Plan evidence base from 2017*

(with a minor update in 2018), which is likely to be significantly out of date. We understand that the new London Plan is currently being prepared, and an updated student's needs assessment is expected to be published this Autumn as part of the evidence base. In our view, it is likely to identify an increase in demand for student accommodation given the lack of delivery over the previous 5 years. The draft Camden Local Plan should therefore take account of the updated student need assessment when published and set out a higher target for Camden.

According to the HESA Student Record (2021/2022) Camden had the second largest number of students in Greater London, with 68,500 full-time students studying within the Borough. This is only surpassed by Westminster who has 86,000 full-time students studying within the Borough. 59% of full-time students study in four boroughs (Camden, Westminster, Islington and Tower Hamlets), but the same proportion of students live across 13 boroughs. This highlights the undersupply of student accommodation in the borough. Tower Hamlets and Camden are the London borough with the highest number of full-time students living in them, with 25,000 students in Camden. The below chart highlights this imbalance between where students live and study.



**Figure 1 - full-time student population live and study location, based on borough**

Based on the most current available student population data, analysis shows there could be a demand pool of up to 201,530 full-time students who may want student accommodation in London. In 2023/2024, the supply of beds in London was estimated to be 100,156 which only accounts for 50% of the total demand pool, leaving a significant undersupply of student accommodation within London, which Camden has a significant share of. This places pressure on Camden's housing market. Based on 2021/22 HESA student data and the known operational PBSA beds in 2023/24, there is a potential unmet demand of approximately 75,976 full-time students at the universities in the federation who could potentially require, but not be able to access, PBSA. There are several schemes with consent to develop which either have support of or are being undertaken by a member institution. In the event of the entire pipeline of these schemes being built out, the unmet demand would still stand at almost 69,900 full time students. Additionally, any future student growth could contribute directly to unmet demand increasing the demand for housing. Consequently, the provision of new PBSA schemes within Camden will help to release self-contained housing currently being used as student accommodation.

The University of London currently has 3,624 bed spaces, across 9 schemes, and is committed to providing circa 2,500 additional bedspaces within the Borough and the Bloomsbury Campus Area, but needs specific policy support to deliver additional spaces. Firstly, through an updated and higher target for student bedspaces within the Borough, and secondly through the provision of a specific target for the Bloomsbury Campus Area, given that a significant amount of the student housing provision is likely to come from within this area. Inclusion of a target would safeguard the delivery of student housing in this appropriate location, rather than allowing it to be dispersed into locations which may be further from the area in which there is demand.

It is acknowledged that the draft policy allows for exceeding the target, however it is likely that this will be resisted given the Council's priority is for 'permanent self-contained housing' – when the updated evidence base of the London Plan is likely to confirm a greater need than 200 additional places.

In addition, from reviewing the Consultation Statement it is evident that there is some hostility to student accommodation in certain locations, such as Somers Town, this may partly be for the reason that there is not an



*academic presence in this location compared to the Bloomsbury Campus Area where student accommodation is more appropriate.*

*The sensitivity of the Bloomsbury Campus Area, in terms of the concentration of listed buildings and other heritage assets, needs to be acknowledged in relation to delivering student accommodation in the appropriate location. The draft policy should acknowledge these considerations and that significant weight should be afforded to the need for this type of housing.*

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

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*Part B*

*The Council will seek a supply of student housing to meet or exceed Camden's target of 200 (insert updated target based on new London Plan evidence base) additional places in student housing per year, with a significant proportion being located in the most suitable locations including the Bloomsbury Campus Area (as defined by Policy S4) and will support the development of student housing provided that the development.*

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☐

No

☒

Yes

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

In order to ensure that the interests of the University of London, who is an important institution providing education and employment, and has significant land holdings in the Borough, are represented in relation to policies which will affect how it operates in the future.

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<b>11. Signature:</b>	<b>N Belsten</b> o.b.o. University of London	<b>Date:</b>	26.06.2025
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Date: Thu, 26 Jun 2025 16:32:37 +0200

From: Ian Terry

To: [redacted]

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

---

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

---

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

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

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

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

#### 2. Overlooking and Loss of Privacy

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

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

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) - sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);

- Moore v SSCLG [2013] EWCA Civ 1194 - established that mutual amenity impacts must be weighed in Traveller site cases.

---

### 3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

---

### 4. Access Constraints and Undeliverability

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

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

---

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

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

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

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

---

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

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

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

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### 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

Ian Terry

Sent from my iPad



Dear Planning Policy Team,

I am writing to express my strong objection to the proposed allocation of land adjacent to Constable House (Eton College Road) and at Freight Lane (York Way Depot) for use as Gypsy and Traveller sites in the Camden Local Plan.

While I understand the Council's obligation to meet the accommodation needs of all residents, including Gypsy and Traveller communities, I believe these proposed locations are deeply unsuitable and raise serious concerns for existing local residents. My key objections are outlined below:

**1. Over concentration and Population Density**

The proposed locations are already in densely populated areas. Introducing additional households, even in small numbers, will place further strain on local services, including schools, GPs, and waste management.

**2. Littering and Waste Concerns**

Existing traveller sites across the UK have, in some cases, led to increased littering and improper waste disposal. Despite Council management plans, residents are worried about the site being inadequately maintained, affecting cleanliness, hygiene, and attracting vermin.

**3. Impact on Amenity and Neighbourhood Character**

Residents in the surrounding area will be directly affected by increased noise, reduced privacy, and a general change to the character of the neighbourhood. The proposed screening measures are unlikely to mitigate these impacts adequately.

**4. Traffic, Parking, and Access Issues**

The Constable House site in particular has limited vehicular access and is already congested. Additional large vehicles, including caravans or service vans, may exacerbate traffic and reduce available parking for residents.

**5. Site Unsuitability and Space Constraints**

These are small, urban plots not designed to accommodate a nomadic-style community or static pitches. The confined layout could lead to overcrowding and safety hazards both for those on the site and nearby residents.

**6. Security and Social Cohesion**

Many residents are anxious about potential increases in anti-social behaviour, especially given the close proximity of the proposed sites to family homes, parks, and schools. Whether justified or not, these concerns significantly affect the sense of safety and cohesion in the community.

**7. Negative Impact on Property Values**

It is well-documented that proximity to temporary or traveller accommodation can depress house prices in surrounding areas, creating financial disadvantages for long-standing residents.

**8. Alternative Options Not Fully Explored**

The FAQs document notes that other sites were dismissed for relatively minor reasons such as loss of parking or overlooking. It is concerning that more appropriate locations with lower residential impact were not prioritised instead.

I strongly urge the Council to reconsider the proposed sites and undertake further consultation to identify more suitable, less disruptive locations for Gypsy and Traveller accommodation.

Thank you for your attention to this matter.

Kind regards,

Jodie Matthey

Responder 407

Date: Thu, 26 Jun 2025 14:41:42 +0000

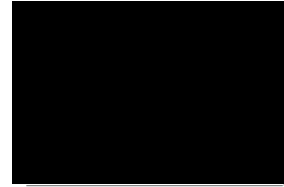
From: Natalie Davies

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

Subject: Representations to the New Camden Local Plan on behalf of Lab Tech

---

[REDACTED]



Planning Policy  
London Borough of Camden  
5 Pancras Square  
London  
NC1 4AG

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

**26th June 2025**

## **Camden Local Plan – Proposed Submission Draft 2025**

### **Representations by Lab Tech Limited**

On behalf of our client LabTech Limited (“LTL”) we are instructed to submit representations to the Draft New Camden Local Plan, 2025. Our client has substantial land holdings in and around Camden Town Centre and is keen to participate in the planning policy process. These representations seek to supplement those submitted to the Regulation 18 consultation in March 2024.

As a general point, the Government has made it clear that they want to make new local plans simpler to understand and use so that communities can more easily shape them. It is considered that the Draft Local Plan is too detailed and does not provide the flexibility required to deal with emerging national and regional policy updates.

Lab Tech is concerned that the impact of the layering of policies and obligations within the Draft Local Plan, which are currently drafted with very little flexibility, will be extremely detrimental to the viability of development going forward. This will prevent Camden from achieving its vision set out in We Make Camden. As such the LPA consider that there should be a general policy introduced about the need for a flexible and ‘on balance’ application of the policy across the plan as a whole, to respond to changing economic conditions over the plan period and the unknown policy requirement in the new London Plan.

### **Policy H2 - Maximising the supply of self-contained housing from mixed-use scheme**

Lab Tech acknowledges that Camden's priority is the delivery of self-contained housing but requiring housing from commercial led schemes undermines other policy objectives in the Plan and the London Plan which promote economic development within the Borough.

Policy H2 which requires housing from commercial schemes is in direct conflict with the London Plan and is increasingly challenging as it threatens to undermine the deliverability of commercial development in the Borough. Camden is the only borough in London which still has a mixed-use policy, which impacts its commercial attractiveness and therefore investment when compared to other parts of central London. It is acknowledged that Camden is falling short of achieving its annual housing targets. However, we do not consider the requirement for housing to be delivered alongside and to the detriment of commercial development in Central London as an appropriate or justified strategy for addressing this issue.

Our client's landholdings are, in the main, commercial and for the markets in particular to survive, Lab Tech requires flexibility and adaptability in the policy. The retention of this policy results in pre-application negotiation delays as lengthy discussions are held to demonstrate why the delivery of housing alongside commercial uses is inappropriate. We therefore consider that Policy H2 is unjustified and should be deleted.

### **Policy IE1 – Growing a successful and inclusive economy**

Whilst it is appropriate for the majority of the criteria in draft Policy IE1 to be set out in the Local Plan, we consider that a number of the criteria go beyond what is appropriate for planning policy to control namely:

Part 11. it should not be for the planning system to address the provision of childcare facilities to support working families. This should be deleted as it is unjustified.

Part 12. the market should dictate the need to provide digital connectivity to support occupiers. This is not a planning requirement and should be deleted as it is unjustified.

### **Policy IE2 Offices**

In response to the proposed wording for Policy IE2, LabTech supports part C, namely the reduction in the length of the marketing period required (from 24 to 12 months) to justify a loss of office space is therefore welcomed. However, it is not considered necessary to require the space to be marketed by two agents if the agent chosen is reputable. This leads to an additional burden on costs associated with a site.

Lab Tech does not consider there is justification for the inclusion of Part C (2) relating to discounted rent and incentives This is not a planning matter and should be removed.

Part C (3) Whilst it may be feasible to reconfigure office space, if there is a lack of demand for the space, it is not reasonable for landowners to invest in reconfiguring a building which is not fit for purpose. In any event, in most cases, internal alterations do not require planning permission and this reference should be deleted.

Part C. Reference to premises which cannot lawfully be leased due to their energy efficiency performance requirements is welcomed.

Part D. Notwithstanding the floor area, if it can be successfully demonstrated that there is no demand for office accommodation, then there is likely to be no requirement to provide affordable workspace. Reference to the provision of affordable workspace should be deleted as it is unjustified.

Where office buildings become redundant, LBC's preferred alternative use is housing. The paragraph also refers to supporting the conversion of offices to student accommodation. This reference in paragraph 9.39 should be deleted as in many cases housing/student accommodation may not be the best use of land.

### **Policy IE4 – Affordable and specialist workspace**

Draft Policy IE4 (Affordable and Specialist Workspace) is new and would require all major schemes (including mixed use developments) providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the

delivery of affordable workspace. It will also apply to sui generis uses of a similar nature or character.

The Policy seeks 20% of the net additional floorspaces to be provided at 50% of the market rent for a minimum period of 15 years. Following our previous representations, The Lab Tech is concerned that 20% affordable workspace at 50% market rent is wholly unrealistic and that the target should be much less onerous. The average affordable workspace delivered on schemes in Camden is usually less than 10% of the uplift in floorspace and at 80% of the market rent. Imposing yet further stringent policy requirements will lead to further protracted planning negotiations and delay in delivery. The policy should be assessed on a site by site basis and factor in viability as well as other policy requirements.

### **Policy IE5 Hotels and visitor accommodation**

The draft hotel Policy IE5 (Hotels and visitor accommodation) has been tightened to restrict large scale hotels and visitor accommodation of 2,500 sqm or more (GIA) to be located within the CAZ, and smaller and medium hotels in the town centres and in locations with an established commercial or mixed use character in the CAZ. There is no definition of medium or small-scale hotels. To make most modern hotel developments viable in London, a minimum of 80-90 keys is often required which would usually result in a hotel of greater than 2,800sqm when back of house and ancillary facilities are included. Hotels contribute to employment opportunities and expenditure within the Borough and should be supported, particularly if redundant buildings are being re-used.

There is strong demand for hotel beds in London and particularly in and around Camden Town and therefore flexibility on size should be applied, particularly where existing buildings could be retrofitted.

The draft policy seeks to apply the sequential test where additional hotel accommodation is proposed outside a town centre. This flexibility is supported.

### **Policy IE6 Supporting Designated Centres and Essential Services**

The draft retail Policy IE6 includes a new requirement which expects major developments providing 2,500 sqm or more of retail floorspace to include a proportion of smaller units, including floorspace available at a discount to market rents.

There is no justifiable evidence base or viability analysis to support this requirement and a lack of any detailed guidance and therefore it should be removed.

### **Policy IE7 - Hot Food Takeaways**

Lab Tech owns Camden markets where there are many hot food take-aways. These food units are integral to the character of the market. To allow the market to thrive in accordance with Policy IE10, it is requested that part 2 of the policy should be amended to read:

*resist new hot food takeaways elsewhere in the borough (save for Camden Markets), where these would increase the total number of hot food takeaways within a designated centre, above the current Camden Retail Survey baseline; and...*

In respect of part 3 of the policy, it is unreasonable to require a Health Impact Assessment for a new hot food stall within the market as this type of use is expected across the markets. If the current wording is retained, it will turn prospective tenants away from the markets as it would add

additional time and cost to the process. These tenants are needed for the markets to survive. The wording to the policy should be revised to read:

*require applicants for new hot food takeaways within high streets or near schools to undertake a Health Impact Assessment in accordance with Policy S1 (Health and Well-being) to demonstrate that the proposal will not impact on existing health needs and levels of overweight and obesity in the local area.*

### **Policy IE8 Gambling Uses**

Whilst the previous version of the Draft Local Plan has been amended to remove the phrase ‘adult gaming centre; in the supporting paragraph, Lab Tech remains is concerned with the lack of definition relating to the term ‘Gambling Uses’ and the impact this could have on the night-time economy. It is considered that policies should reflect the need to support a range of uses within the night-time economy, and a blanket ban on the term gambling would fail to protect night-time venues and spaces. Many of the family entertainment uses within Camden Markets do have elements of gambling in the form of competitive entertainment. In order for the markets to thrive under policy IE10, it is suggested that the draft policy is amended to refer to ‘betting shops’.

### **Policy IE10 – Markets**

Lab Tech owns the majority of markets within the Borough. The markets are important, not only for Camden but London as a whole as they are a worldwide attraction. It is not for planning policy to stipulate that there should be a variety of rents, particularly when there is the difference in market retail rents compared to traditional retail spaces. It is therefore it is considered that this reference contained in part 3 of the policy is removed. it is important to recognise that larger market units are also required to support grow-on space. Part 3 of the policy could be re-worded to read

‘Seek the provision of stalls and spaces, at a variety of rents, including larger units to support grown on space with consideration given to how start-up businesses can be supported;

In addition, markets inherently have a high turnover of tenants and traders and therefore flexibility needs to be applied to allow the market to flourish and remain sustainable.

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

Part A. We support the objective of achieving excellence in architecture, responding to climate change, improving the health and wellbeing of Camden’s communities and celebrating the diversity of Camden’s people and place.

Part C (2).) states that where public spaces are provided as part of developments the Council will require that these spaces celebrate and reflect the diversity of the communities, they are within through high quality interpretation, events, public art and decorative features codesigned with local people. Whilst there may be instances where co design is appropriate, we are concerned with this being a requirement of policy and this reference should be removed.

**Draft supporting Paragraph 12.12** – refers to the use of architect retention clauses in legal agreements where appropriate. The retention of the architect by a developer post planning is driven by a number of factors. It should not be a decision for the local planning authority. The purpose is to ensure design quality which is controlled through the use of detailed design related conditions. This bullet point should therefore be removed.

We trust that these representations will be considered as part of the Examination in Public. If you have any queries, please contact Natalie Davies at the above office.

Yours faithfully

[Redacted Signature]

Natalie Davies

[Redacted Address Line 1]

[Redacted Address Line 2]

[Redacted Address Line 3]

[Redacted Address Line 4]



Date: Thu, 26 Jun 2025 15:08:32 +0000  
From: John Emanuel  
To: PlanningPolicy  
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

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Dear Planning Policy Department

I have just learned of the proposed travellers' site, and I understand that you are responsible for evaluating feedback from the public. I have the following comments regarding this potential scheme.

I would like to feel that Camden applies the same rules, without disadvantage or privilege, to all citizens, including travellers.

If the site were considered suitable for residential purposes, what other options been considered, such as permanent homes? Which options would be best for the community at large and for the urban environment? Would the residents, whoever they might be, have the right to conduct trade from the site and what provisions would there be to monitor and control any limitations? What would the basis for rent to the Council be?

Has the site been considered for commercial premises, mini-park amenities, or even natural wilding?

Have travellers had the opportunity to evaluate whether the site might, or might not, be a good place to establish an encampment?

Is a site for just two caravans socially and financially viable?

Please include these comments in the consultation documents. Thank you.

Yours sincerely

John Emanuel



Planning Policy  
Camden Council

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



**Chris Colloff**

Email: [chris.colloff@thameswater.co.uk](mailto:chris.colloff@thameswater.co.uk)  
Mobile: 07747 647021



Thames Water Ltd  
1<sup>st</sup> Floor West  
Clearwater Court  
Vastern Road  
Reading  
RG1 8DB



[thameswater.co.uk](https://www.thameswater.co.uk)

**Our Ref:**

26 June 2025

## Camden Local Plan Reg 19 Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water on the Camden Local Plan. Thames Water are the statutory water and sewerage undertaker for borough and as such have the following comments to make on the Local Plan.

### Site Specific Comments

A RAG assessment has been undertaken of the proposed site allocations within the Local Plan in relation to the impacts on water and wastewater infrastructure. Please find a copy of the assessment enclosed for information. We support the content of Policy A1 and the supporting text including the potential requirement for phasing conditions to be used to ensure that the occupation of development is aligned with water and wastewater infrastructure delivery.

### Policy Comments

Thames Water support the requirements of Policy CC9 and CC11 but consider that improvements to the wording and supporting text could be made to ensure the policies are effective. Please find enclosed response forms in relation to these policies

I trust that the above comments will be given due consideration. Should you have any queries regarding the comments please do not hesitate to contact me.

Your sincerely,

Chris Colloff  
Planner

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

Title	Mr	
First Name	Chris	
Last Name	Colloff	
Job Title (where relevant)	Town Planner	
Organisation (where relevant)	Thames Water Utilities Ltd	
Address Line 1*	Clearwater Court	
Address Line 2	Vastern Road	
Post Town*	Reading	
Post Code*	RG1 8DB	
Telephone Number	07747647021	
E-mail Address	thameswaterplanningpolicy@ thameswater.co.uk	

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

Name or Organisation: Thames Water Utilities Limited

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

(3) Complies with the Duty to co-operate

Yes

No

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

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

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

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

(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.

Thames Water support Policy CC9 in relation to water efficiency and provide environmental discounts on connection charges to incentivise increased water efficiency measures. Further information on these incentives can be found at: [Charging arrangements for new connection services 2025/26](#)

Compliance with the optional standard for water efficiency is secured via the Building Regulations where a planning condition is attached to a planning approval. Evidence has demonstrated that the 'fittings based approach' is more effective at ensuring the optional standard is complied with and the environmental discounts offered by Thames Water require this approach to calculation of water efficiency to be used. Without reference to the use of the fittings

based approach within the policy or supporting text it is not considered that the policy will be effective in ensuring potable water usage is minimised. Furthermore, the policy will become out of date in the event of changes to the optional standards following adoption of the Local Plan.

(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.

To ensure that the policy and planning decisions are effective in delivering water efficiency and that the Local Plan is sound it is considered that additional supporting text should be added to clarify that planning conditions will be attached to decisions for new residential development requiring the optional standard for water efficiency to be achieved using the 'fittings based approach'. This should then be referenced within planning conditions on new approvals.

To ensure that the policy is future proofed in relation to any changes to the optional standard for water efficiency it is considered that the policy should be revised as set out below.

"2. require all residential development to meet the optional requirement for water efficiency set out in Part G of the Building Regulations of 110 litres per person per day (including 5 litres for external water use), **or any higher standard that may be adopted**. Proposals will be strongly encouraged to reduce daily water use even further than this where 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)?

☒ X

No

☐ Yes

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

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

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

(a) when the Camden Local Plan has been submitted	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](#).

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

Name or Organisation: Thames Water Utilities Limited

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

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

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

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

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

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

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

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

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

In order to ensure consistency with the London Plan Part A of the policy should require all development to aim to achieve greenfield run-off rates. In relation to part E of Policy CC11, the Counters Creek catchment has been subject to issues of sewer flooding. The sewer network within London is a combined system and as a result the system can surcharge during storm events with basement properties at particular risk. While basement properties are at greatest risk, any development can contribute to, or reduce, this risk by adding more surface water flows to the combined network or by removing or attenuating surface water from the network however, amendments to Part A of the policy would likely make the requirements of Part E a duplication.

For basement development, additional water can be discharged to the sewer network through dewatering to prevent groundwater ingress. As a consequence, the policy should seek for basement development to offset this impact by going being green-field run-off. Potentially this could involve retrofitting of SuDS within the development site.



Since the publication of the Regulation 19 Local Plan the National Standards on SuDS have been published. The requirement to comply with the National Standards should be referenced within the Policy/supporting text to ensure the policy is sound.

(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.

To ensure that the policy is consistent with the London Plan part A of Policy CC11 should be revised to read:

“All development proposals should follow the London Plan drainage hierarchy to reduce surface water run-off rates as far as practicable **and aiming to achieve greenfield run-off rates....**”

In order to ensure that the Local Plan is effective at reducing sewer flooding risks it is considered that Part E of the Policy should be revised as set out below:

~~In the Counters Creek catchment area (shown on the Planning Policies Map) applications for~~  
**Basement development, will be required to offset any impacts of basement water entering the sewer network by reducing surface water discharge from the site beyond greenfield run-off rates.** ~~and other development vulnerable to flooding in areas identified at risk of flooding, should seek to reduce surface water run-off rates to be as close to the greenfield run-off rate as feasible.~~

The supporting text for the policy should also be revised to state that:

**New basement development should offset any discharge of basement water, such as from water from dewatering that is discharged to the sewer network to prevent water ingress, by going being greenfield run-off rates. This could be achieved through the retrofitting of SuDS measures within the wider site.**

**SuDS proposals for new development will be required to comply with the National Standards for SuDS.**

(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)?

☒ X

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

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

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

11. Signature:		Date:	
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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.

Site ID	Site Name	STW Catchment	Waste Network RAG Assessment	STW RAG Assessment	Water Network RAG Assessment	Additional Comments
65146	ALLOCATION O2 Centre, car park, car showrooms and 14 Blackburn Road	Beckton				
65113	Allocation C10 Juniper Crescent, Camden, LONDON, NW1 8AA (LP)	Beckton				
65094	Allocation C11 Network Rail Site at Juniper Crescent (LP)	Beckton				
79037	Allocation C12 Gilbeys Yard (LP)	Beckton				
65092	Allocation C13 West Kentish Town Estate, Weedington Road, London, NW5 4ND (LP)	Beckton				
79038	Allocation C14 Hawkridge House, Warden Road (LP)	Beckton				
65098	ALLOCATION C15 Wendling Estate and St Stephens Close (LP)	Beckton				
71721	ALLOCATION C16 – Shirley House (LP)	Beckton				
65101	ALLOCATION C17 Camden Town over station development	Beckton				
71766	ALLOCATION C18 UCL Camden Campus; 109 Camden Road	Beckton				
58397	Allocation C19 Arlington Road former depot site	Beckton				
46412	Allocation C2 Regis Road and Holmes Road depot (LP)	Beckton				
57884	Allocation C3 Murphy Site (LP)	Beckton				
26940	ALLOCATION C4 Kentish Town Police Station (LP)	Beckton				
60846	ALLOCATION C5 369 – 377 Kentish Town Road (LP)	Beckton				
26948	ALLOCATION C6 Kentish Town Fire Station (LP)	Beckton				
2160	Allocation C7 Morrisons Supermarket (LP)	Beckton				This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess.
65396	Allocation C8 Former Morrisons petrol filling station (LP)	Beckton				In order to make an assessment we require information on the proposed scale of development
65103	Allocation C9 100 Chalk Farm Road (LP)	Beckton				This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess.
34965	ALLOCATION N2 Former Mansfield Bowling Clu	Beckton				This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess.
65106	ALLOCATION N3 Queen Mary's House	Beckton				
65080	ALLOCATION N4 Hampstead Delivery Office	Beckton				
65112	ALLOCATION S10 Bangor Wharf and Eagle Wharf (LP)	Beckton				
65093	ALLOCATION S11 - Former Royal National Throat, Nose and Ear Hospital (LP)	Beckton				
65085	Allocation S12 Belgrove House, Belgrove Street, London (LP)	Beckton				
65165	ALLOCATION S13 (IDS17) - Former Thameslink station, Pentonville Road (LP)	Beckton				
22654	Allocation S14 Land at Pakenham Street and Wren Street (LP)	Beckton				
22640	Allocation S15- Land to the rear of the British Library (LP)	Beckton				In order to make an assessment we require information on the proposed scale of development
22650	Allocation S16 Former Central St Martins College (LP)	Beckton				
65084	Allocation S17 Selkirk House 166 High Holborn 1 Museum Street 10-12 Museum Street, (LP)	Beckton				This site has planning approval so we have not undertaken any further assessment. If the proposal changes we will need to reassess.
65166	Allocation S18 135-149 SHAFTESBURY AVENUE, LONDON WC2H 8AH (LP)	Beckton				In order to make an assessment we require information on the proposed scale of development
65111	Allocation S19 Cockpit Yard and Holborn Library (LP)	Beckton				
79012	Allocation S20 York Way Depot and adjacent land at Freight Lane (LP)	Beckton				
65168	Allocation S5 120-136 Camley Street (LP)	Beckton				
65089	Allocation S6 104 – 114 Camley Street and Cedar Way Industrial Estate (LP)	Beckton				
26944	Allocation S7 24-86 Royal College Street, Camden Town, London, NW1 0QA (LP)	Beckton				
54959	Allocation S8 ST PANCRAS HOSPITAL (LP)	Beckton				
65169	ALLOCATION S9 - Shorebase Access (LP)	Beckton				
76510	ALLOCATION W3 11 Blackburn Road	Beckton				
65100	ALLOCATION W4 13 Blackburn Road	Beckton				
65088	ALLOCATION W5 188 – 190 Iverson Road	Beckton				
60156	ALLOCATION W6 Meridian House	Beckton				
71744	ALLOCATION W7 Gondar Gardens	Beckton				
79059	Allocation W8 88-92 Kilburn High Road, Kilburn	Beckton				

## Network Assessment

On the information provided we do not envisage infrastructure concerns in relation to this development/s

On the information provided modelling may be required to understand the impact of development

On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary

## STW Assessment

On the information provided we do not envisage infrastructure concerns in relation to the capacity at the STW

We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth

There are concerns about the capacity at the STW to accommodate future growth

**This assessment is based on the information provided and correct as of the date the assessment was carried out (June 2025)**

The following assumptions have been made:

- The connection will be made to the closest and largest foul water or combined sewer via gravity.
- All surface water will be disposed of at source as per the drainage hierarchy. Should surface water require a connection to the public network, further assessment will be required.
- Thames Water have only assessed the existing water and wastewater network and its capacity to serve the proposed development.
- It is the responsibility of the developer to contact Thames Water ahead of any planning application submission to determine the presence of any Thames Water assets that may require protection, diversions or that may have an impact on the amenity of new occupiers of the development.

### Notes:

- Modelling for network upgrades will proceed once sites have planning approval and there is certainty of development coming forward.
- Where network upgrades are required it can take 18 months to 3 years to plan and deliver from the point at which there is certainty of development coming forward.