

## 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="Mike"/>	<input type="text"/>
Last Name	<input type="text" value="Priaulx"/>	<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: **Swifts Local Network**

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

Documents can be found at the following links:

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

Paragraph  Policy  Policies Map

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

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

Policy 11.48 reference to

swifts bricks is welcome, but reference to 5m from host building is not sound or effective because it's unclear - this 5m distance is only relevant where the swift brick is located.

Note that RSPB guidance for swift boxes states more clearly:

"a minimum 5m clear drop beneath and in front of the box."

([https://shopping.rspb.org.uk/INTERSHOP/static/WFS/RSPB-rspbUK-Site/-/RSPB/en\\_GB/Product%20PDFs/RSPB%20SWIFT%20NEST%20BOX%20PDF.pdf](https://shopping.rspb.org.uk/INTERSHOP/static/WFS/RSPB-rspbUK-Site/-/RSPB/en_GB/Product%20PDFs/RSPB%20SWIFT%20NEST%20BOX%20PDF.pdf) )

(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 paragraph 11.48 sound and effective, please replace the unclear text in sentence four "between the host building and other buildings/ obstructions",  
to clearer and more relevant text based on RSPB guidance:  
"beneath and in front of the swift brick".

(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:	Mike Priaulx	Date:	27/06/25
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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: Fri, 27 Jun 2025 12:21:59 +0000  
From: Fi O'Sullivan  
To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
Subject: Gypsy and traveller site identification study.

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Gypsy and traveller site identification study.

I didn't know about it until today but am pleased you are making some more provision for this often misunderstood and racially targeted and very underrepresented vulnerable tribe/ group. Wherever the site is it needs to be safe and away from obvious attack, and it will naturally expand. I don't know all the sites, and if the gypsy and travellers get a say so, which i hope they do?? but the Frideswide Place site in KT i remember at least being big ( we queued for covid jabs their as a family!) and a little off the main road. So safer for young children and animals. It could do with a few big trees and apple trees in tubs, and food allotment in raised beds, would help as all concrete, no shade i remember  
Being of irish decent and feeling often nomadic myself! And knowing more than 20 travellers over the years I really hope you can get it sort for them. And it has the positive knock on of freeing up some much needed housing stock!  
Thank you very much.  
All the very best  
Fi O'Sullivan

Date: Fri, 27 Jun 2025 13:21:42 +0100

From: Noemi Gyori

To: [redacted]

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

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Dear Sir / Madam,

I hope this message finds you well.

I am writing to you regarding the proposed allocation of Site C27 for Gypsy and Traveller accommodation. I live in [redacted] and walk through the area in question daily, therefore witnessing first-hand the use, atmosphere, and constraints of this particular space.

I would like to formally express my objections to the proposed designation of Site C27 for the following reasons:

**1. The site is too small and densely located for the proposed use.**

This is a highly compact and already crowded neighbourhood. The proximity of buildings such as Eton Hall, Eton Place, and Eton Rise-immediately surrounding the site-creates a high-density urban environment with very limited open space. The site itself is minimal in size and hemmed in on all sides, lacking the kind of open environment that is generally suited to the Traveller lifestyle. In my opinion, this space would not provide an appropriate or dignified setting for a Traveller community, which typically values more privacy, outdoor space, and a level of independence that simply cannot be offered in this setting.

The proposed site is directly overlooked from multiple flats and balconies, including those in Eton Hall, as well as Constable House, Eton Place, and Eton Rise. The proximity of these residential buildings means that both the current local residents and future Traveller families would experience a significant lack of privacy. This is not a matter of personal inconvenience alone-it is a fundamental issue of respect and quality of life, affecting everyone concerned.

**2. The site presents a flood risk.**

This site is frequently waterlogged and subject to surface water pooling, especially after rainfall. According to Planning Practice Guidance, Traveller pitches are classified as "Highly Vulnerable Use" and should not be located in areas with known flood risks. This designation alone should preclude the suitability of Site C27 for this purpose.

**3. Lack of appropriate vehicular access.**

The site is accessed only via narrow estate roads and pedestrian footpaths, which are not suitable for large vehicles, caravans, or emergency services. There is no independent or adoptable vehicular access, making it highly impractical for the needs of a Traveller community and posing potential safety concerns.

**4. The area experiences constant high footfall and congestion.**

Being adjacent to Chalk Farm tube station and a short walk from Primrose Hill, the site lies within an area that sees extremely high pedestrian traffic-particularly on weekends and during events at the Roundhouse. Crowds and congestion are a regular feature here, and introducing residential use of this nature into such a saturated zone risks compounding pressures on infrastructure, safety, and community cohesion.

**3. The site currently functions as valued green communal space.**

The area in question has long been an established green space, managed as part of the "Communi-trees" greening initiative. It is actively used as a play and gathering area, particularly by the families in Constable House. Its loss would deprive the neighbourhood-especially children and elderly residents-of one of its very few accessible, communal outdoor spaces. In an area already so limited in greenery, the impact would be deeply felt.

In conclusion, while I fully support inclusive policies and the provision of appropriate accommodation for all communities, I do not believe Site C27 is a suitable location for Traveller pitches. Its size, setting, lack of access, flood risks, and public exposure all point to its fundamental unsuitability-both for existing residents and for any future occupants.

Thank you very much for your attention to these concerns. I trust that local feedback will be taken seriously, and I hope to hear from you in due course.

Kind regards,  
Noemi Gyori

[REDACTED]

[REDACTED]

[REDACTED]



Responder 520

Date: Fri, 27 Jun 2025 12:25:30 +0000  
From: Jason Chainey  
To: PlanningPolicy  
Subject: Recycling centre move

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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.

Hi,

It is with great disappointment that I read about your hidden and unconsulted proposal to move the recycling centre to Holmes Road, opposite the primary school. I wish to register my formal objection to it being moved.

Kind Regards  
Jason chainey  
[redacted address], [redacted postcode]

Sent from my iPhone

Date: Fri, 27 Jun 2025 12:32:32 +0000  
From: Roxane Fricou  
To: PlanningPolicy  
Subject: Objection to Proposed Relocation of Recycling Centre to Holmes Road /Regis Road

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Dear Camden Council Regeneration and Planning Teams,  
I hope this message finds you well.

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

While we fully support Camden's commitment to sustainability and responsible waste management, we are extremely concerned about the proposed location of the facility and its potential negative impacts on our community. We have prepared the below points which we feel will support this request:

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

In conclusion, I urge you to pause and reconsider this proposal. A Recycling Centre is a necessary part of borough infrastructure — but its location should not come at the expense of children's safety, residents' well-being, and sound urban planning principles. I welcome further dialogue and would appreciate the opportunity to engage in any upcoming consultations on the matter.

Kind regards

Roxane and Frederic Fricou

Date: Fri, 27 Jun 2025 12:35:27 +0000  
From: Neuza Neves  
To: PlanningPolicy  
Subject: Objection: recycling centre at Holmes Road NW5 3A

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As owners of a property at [redacted] [redacted postcode], we strongly object with moving the recycling centre to Holmes Road.

Not only the smell can easily be sensed at over 200m, as falling under the category of "unfavourable commercial use" it will considerably devalue the properties prices in the area.

Looking forward to hearing from you.

Kind regards,

Neuza Denise Neves

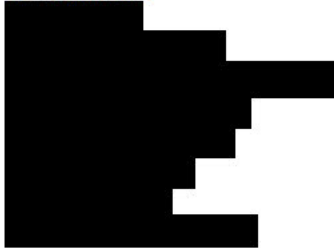


Responder 523

Date: Fri, 27 Jun 2025 12:38:09 +0000  
From: Sam Neal  
To: PlanningPolicy  
Subject: Camden Local Plan - UCL Representations

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*Associate*  
Newmark Planning and Development  
**NEWMARK**





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

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

27 June 2025

Dear Sir/Madam

**Subject: Draft Local Plan – Regulation 19 Consultation**

As an anchor institution within the London Borough of Camden, University College London (UCL) welcomes the opportunity to comment on Camden's Draft Local Plan through the Regulation 19 consultation, which aims to set out the direction of future planning policies.

**Background to UCL**

Founded in 1826 in the heart of London, UCL is London's leading multidisciplinary university, with more than 16,000 staff and 51,000 students from 150 different countries. UCL's main campus is in Bloomsbury, although it has other buildings in Camden and Greater London.

**UCL's Interest**

With an estate of over 250 buildings, UCL is focused on the maintenance and enhancement of its existing estate and facilities, carrying out many refurbishment projects, as well as new developments, in line with an ambitious growth trajectory and desire to remain at the forefront of world class research and teaching. UCL regularly reviews the estate to accommodate the growing number of students, including seeking temporary changes of use to existing buildings within Camden for educational uses to meet unprecedented student levels post-Covid. UCL is actively involved with the planning system on a day-to-day basis and is in the process of developing its Estates Masterplan, and is actively engaging with the Council on this.

UCL has a positive long-standing working relationship with Camden, and this is personified in the Memorandum of Understanding between the two parties, which aims to increase the potential for new collaborations, explore funding opportunities and increase the exposure of the partnership, with the intention to develop similar agreements with neighbouring boroughs.

UCL is also a member of the Bloomsbury Vision Steering Group, focused on developing a cohesive public realm strategy across Bloomsbury for consultation. The Group will consider connectivity and public realm, health and wellbeing, inclusivity and equality and the prioritisation of projects across land ownership boundaries. The Group is formed of key stakeholders: Camden Council, UCL, University of London, Birkbeck and the British Museum.

The draft Local Plan consultation is therefore of great interest and a notable opportunity for major local stakeholders, such as UCL, to be involved in the development of planning policies, which promote the aspirations of the Council, supporting positive development and the needs of stakeholders.

Similar to the previous representations made towards the draft Local Plan, there are six key aspects of the draft Local Plan that UCL wishes to comment on in detail. These key aspects are: Educational Use, Student Accommodation, Tall Buildings, Site Allocations, Inclusive Environments, and Sustainability.

The representations included herein are intended to support and, where necessary, propose modifications to ensure that the final Local Plan is positively prepared, justified, effective, and consistent with national policy, in line with the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF). Each comment is structured to identify specific policies within the Plan and is accompanied by an explanation of the concern or support, along with any suggested changes.

## **Educational Use**

As a major educational stakeholder in the borough, UCL is keen to ensure that the educational institutions are strongly supported within the Local Plan, both based on their existing estates, but also in promoting plans for future development to assist in maintaining a world class research status.

UCL continues to welcome the importance given to educational uses in the defined areas noted for draft Policy S1 (South Camden) and Policy S4 (Bloomsbury Campus Area). Furthermore, UCL continues to support Camden's promotion of the Knowledge Quarter, and the provision of research, learning and knowledge-based uses under draft Policies S1 and S2 (Euston Area).

UCL is supportive of developing Euston as a life science cluster / recognising it is an existing high performing growth sector across various sectors including technology, science, medical/healthcare, and education. UCL is aware of the importance of Euston as a hub of innovation, how HS2 will be an important driver for connectivity in and out of a key cluster in London and how higher education uses will continue to provide a strong positive economic impact in the area.

Due to the extensive synergies between research, learning and knowledge-based uses, and educational uses, UCL considers it is imperative that educational uses are also included within draft Policy S2 to support the delivery of such uses in the Euston Area, and to be consistent with other relevant planning policies such as the Euston Area Plan which supports the provision of education and community facilities in this area. To accommodate this change, UCL would suggest draft Policy S2 is amended as follows:

*"[...] 3. expect development to deliver new and replacement employment floorspace across the Euston Area, and support and prioritise the creation and retention of suitable employment and educational floorspace for research, learning and knowledge-based uses; [...]"*

As set out in previous representations, UCL continues to support the principle of draft Policy S4 (Bloomsbury Campus Area) and the promotion and support for educational uses in this location. However, there are certain key points that require further consideration within the draft Policy.



Firstly, consideration does need to be given to those buildings which may not be the most efficient for educational use, and whether they would be more suited to an alternative land use, for example residential. UCL is currently preparing an estate strategy which will set out our aspirations for the next 25 years, and as part of this we are reviewing the estate and determining how best to distribute services efficiently. As part of this review, it may be considered that certain buildings, with constrained floorplates, may be less efficient for education use and more appropriate for alternative land uses. The current draft policy seemingly restricts the Council from being able to consider alternative land uses which could achieve other unmet needs, such as residential. On this basis, UCL requests that a level of flexibility is afforded to such situations in the borough to promote the best use of existing buildings.

Secondly, offering a level of temporary flexibility for conversion of buildings to an educational use would also help support Higher Education institutions to respond to unexpected alterations in demand, or support ongoing works relating to a wider estate strategy. Such an approach is justified, and necessary to be consistent with the London Plan which supports the development of educational facilities where there is unmet need.

For the two points mentioned above, it is requested that an additional section, part C, is added to draft Policy S4:

“[...] C. The Council will work proactively with Higher Education institutions and support the development of their estate strategies, recognising the need for some flexibility as institutions continue to develop their campuses to meet increased demand and/or changing needs. Where it has been demonstrated that a site is not well suited to an ongoing academic use, the Council will support the delivery of alternative uses, to support the Plan's land use priorities. The Council will also support temporary educational uses in the Borough where demand for these is robustly evidenced and any planning impacts are mitigated.”

The draft Local Plan now includes a proposed boundary map for draft Policy S4. As has been raised historically with the Council, the proposed boundary seems to promote limited coverage for the draft policy. Noting that UCL has a number of main campus buildings that fall outside, but within close proximity, to the proposed boundary, it would be deemed more appropriate and justified for the boundary to cover these areas to further emphasise support for educational uses within the Bloomsbury area. The proposed amended boundary has been included as **Appendix 1** for reference.

Finally, part B of the draft Policy makes specific reference to ‘University of London or its member institutions’ when supporting the promotion of development in the area. Although UCL falls under this definition, the promotion of specific higher education institutions seems to undermine the principle of promoting academic space in the area. It is unjustified, and not consistent with planning policy such as the NPPF and the London Plan which promotes educational uses across a range of prospective operators/institutions. Therefore, it is suggested that this definition is amended to ‘Higher Education Institutions’ to promote inclusivity across the use.

## **Student Accommodation**

UCL supports Camden's focus on delivering a supply of purpose-built student accommodation (‘PBSA’) within the borough. As a Higher Education institution UCL is acutely aware of the lack of supply in PBSA across London when compared to the increasing demand. Not only will further provision of PBSA schemes help to meet future demand, but it will also assist in supporting students who are seen as an important asset to local communities through the diversity they bring to an area, as well as the economic benefits of supporting local businesses.

Upon review of the draft Local Plan, UCL's key comments on draft policies relating to student accommodation are as follows:

1. Draft Policy H1 (Maximising Housing Supply) – UCL supports the revision of this draft policy whereby Student Accommodation is now referred to as a form of housing that assists the Borough in meeting their housing targets.
2. Draft Policy H9 (Purpose-Built Student Accommodation) – As per previous representations, UCL considers the student accommodation target figure a significant underestimate of the amount of additional student housing bedrooms that UCL will require per year to meet existing and future demand for this type of accommodation. Based on UCL statistical information alone, UCL has an existing shortfall of 2,000 beds, with this growing by circa 300 beds per year based on a 2% increase in first year admissions. As such, even just based on one university's shortfall, the figure presented in draft Policy H9 does not come close to meeting the growing demand for PBSA beds in the area. Therefore, at present UCL considers the proposed student accommodation target figure unjustified, and cannot support the target set out in draft Policy H9 and suggests this is revised to promote a more accurate supply need.
3. Draft Policy H9 (Purpose-Built Student Accommodation) – As per previous representations, with regards to part 3 of draft Policy H9, the policy states that PBSA schemes should comply with relevant standards for houses of multiple occupation (HMOs), and now also residential design standards. Although consideration of HMO standards can be seen as standard practice in the industry when considering future PBSA schemes, it seems unorthodox to enshrine in policy something which is not specifically related to the use the policy is written for. Furthermore, promoting residential standards is a notable deviation from the approach to PBSA design and could lead to design conflicts when considering minimum design standards, external amenity requirements etc. This approach is not consistent with the London Plan which states in Policy H15 that PBSA should provide adequate functional living space and layout for the occupants, and in which there is no reference to any specific design standards. UCL therefore suggests that reference to such guidance is removed from the draft policy, although reference may be given in supporting text, however noting that the London Plan does not specify the guidance and therefore flexibility can be afforded.
4. Draft Policy H4 (Maximising the supply of affordable housing) – UCL supports the Council's alignment to the London Plan affordable housing provisions. Maximising affordable student accommodation will help to meet the increasing demand for such units.

## **Tall Buildings**

As mentioned in the previous representations, although in the Building Heights Study (that forms part of the evidence base) Hawkridge House falls within an area of search found suitable for tall buildings, this Site is still excluded from the appropriate areas suitable for tall buildings in the draft Local Plan with no reasoning for this approach. UCL considers its exclusion unjustified and therefore request that this area of the plan is reconsidered to allow for inclusion of Hawkridge House in the allocated areas for tall buildings. UCL would be happy to discuss this further with the Camden Planning Policy team.

## **Site Allocations**

As per previous representations, we raise the same comments made under the Regulation 18 consultation in relation to Draft Site Allocation C18 (109 Camden Road, also known as Ifor Evans), and Ramsay Hall (submitted under the Call for Sites consultation).

Following previous representations, UCL notes that Hawkridge House (Draft allocation C14) has now been allocated to promote additional student accommodation which is welcomed.

Finally, UCL welcomes the amended reference to how indicative housing capacities carry flexibility on the potential development capacity for sites put forward, under draft supporting paragraphs 1.38 to 1.40, and this aligns with comments raised previously.

## **Inclusive Environments**

UCL is strongly supportive of planning policies that are brought forward in the draft Local Plan in relation to inclusive environments, and aspirations for improvements to accessibility for all, as this is fundamental to UCL's objectives when reviewing our estate.

Comments on the inclusive environment were made as part of UCL's representations to the Regulation 18 consultation and still remain valid. Upon further review, UCL wishes to provide some further comments on this topic:

1. Although in our previous representations UCL referred to disabled car parking spaces, and this is how it is referred to in the draft Local Plan, UCL advises such wording should be amended to "accessible parking spaces", acknowledging that some wheelchair-accessible vehicles are classified as vans and may not conform to standard car dimensions. Furthermore, it is considered that particular emphasis should be made to EV charging points at accessible bays (under draft supporting paragraph 10.37), and the list of access measures for parking under Appendix 2 of the draft Local Plan should specifically include accessible EV parking.
2. Throughout the draft local plan, it is considered greater emphasis is required on measurables relating to inclusive design and accessibility to make sure schemes, including extensive landscaped areas, provide suitable measures in the early design stages to improve accessibility for all users and that the draft policies are effective in delivering their objective.
3. Additional comments in relation to the supporting draft Equality Impact Assessment:
  - a. Request to see more explicit reference to ambulant accessible, wheelchair accessible and changing place facilities when discussing free publicly accessible toilets. reference to free publicly accessible toilets.
  - b. Clearer reference should be given to disabled students, not just based on age.
  - c. Under Step 5-1, the approach to no-car policy has not considered the use of EV cars which would negate some of the comments. A commitment to EV vehicles would be welcome pertaining to charging stations and the provision of accessible charging facilities.

## **Sustainability**

UCL welcomes the approach that Camden are taking in the draft Local Plan in further emphasising the importance of sustainability as a key factor in the consideration of future development, as well as highlighting the climate emergency and ways in which the borough is looking to tackle this issue. UCL has recently prepared a Sustainability Plan and it is positive to note a number of alignments between the targets and aspirations of our Plan, and the draft Local Plan. Although UCL is broadly aligned with the aspirations in the draft Local Plan, UCL wish to provide some further suggestive points:

1. It would be beneficial to understand to which definition 'Net Zero' aligns, and whether this is an alignment with the forthcoming Net Zero Carbon Buildings Standard?
2. The revised wording in draft Policy D5 on 'Sustainability improvements to designated heritage assets' is welcomed. However, as mentioned in previous representations, the provision of clearer guidance on the type of sustainability measures that may be considered appropriate would be beneficial, although noting that each heritage asset would have to be assessed on a case-by-case basis in terms of significance and perceived harm from proposed.

## **Conclusion**

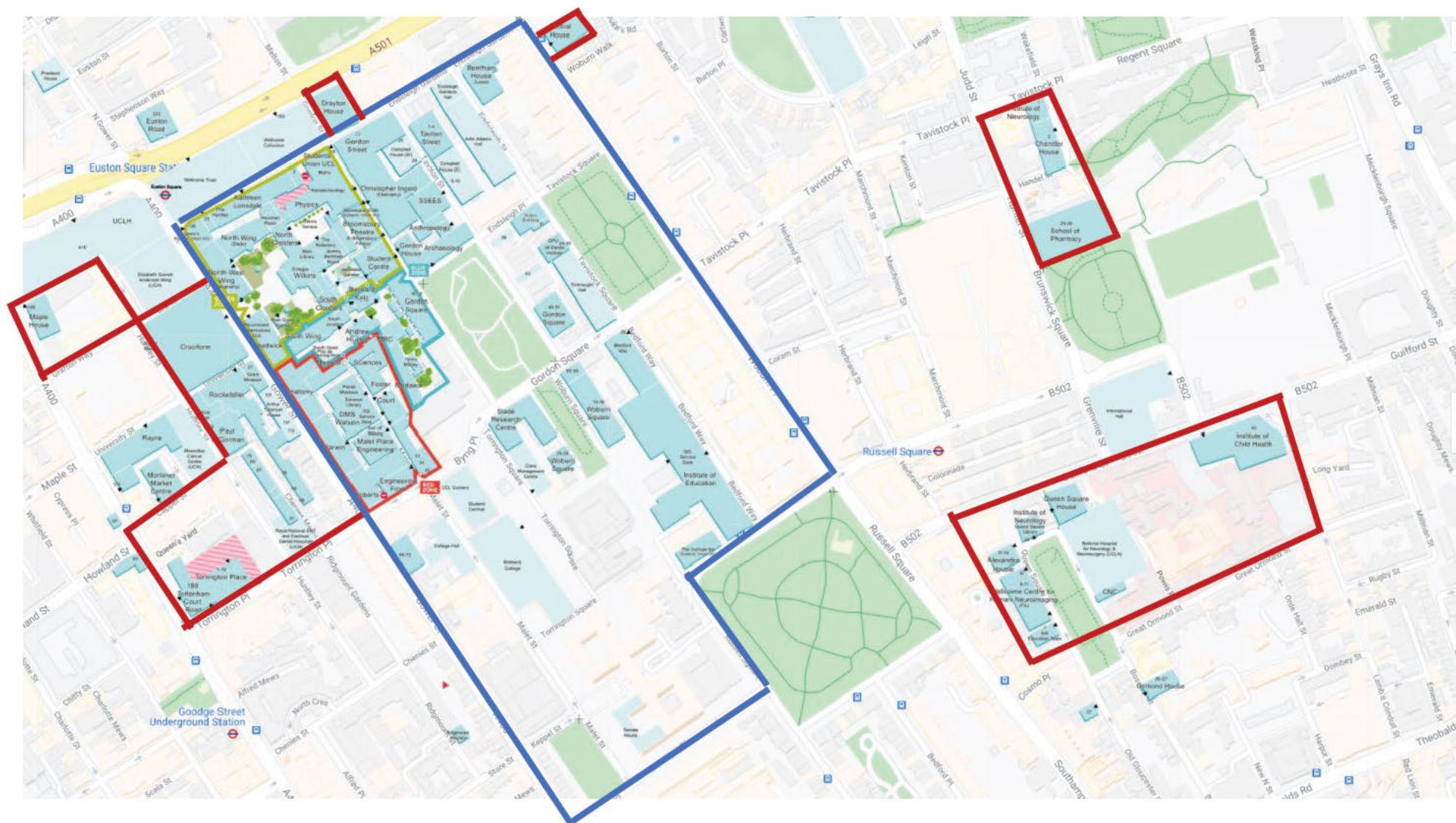
Thank you for the opportunity to contribute to the consultation. UCL looks forward to seeing further positive development of draft planning policies for the borough. If it would be helpful to discuss our views further, please do get in contact with [ucl-property@ucl.ac.uk](mailto:ucl-property@ucl.ac.uk).

Yours sincerely

A black rectangular box redacting the signature of Kate Richardson.

**Kate Richardson**

A black horizontal line redacting the contact information of Kate Richardson.



Responder 524

Date: Fri, 27 Jun 2025 12:39:26 +0000

From: Hannah Cox

To: PlanningPolicy

Subject: Camden Local Plan Proposed Submission Draft - Representations on behalf of KCCLP

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

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

27<sup>th</sup> June 2025

Dear Sir/Madam

**CAMDEN LOCAL PLAN PROPOSED SUBMISSION DRAFT – REGULATION 19  
CONSULTATION VERSION (APRIL 2025)**

These representations to the Camden Local Plan Proposed Submission Draft (April 2025) (“the Draft Plan”) are made on behalf of Kings Cross Central Limited Partnership (“KCCLP”). KCCLP is most well-known for its mixed-use regeneration scheme at King’s Cross and is committed to developing projects of scale in London that involve creating lasting, liveable places. As demonstrated at King’s Cross, such projects require a long-term view to investment and returns, and significant investment in social infrastructure, services and public realm in order to create and maintain a flourishing community.

The focus of these representations is the St Pancras Hospital Site Allocation (Draft Plan Allocation S8). KCCLP have been engaged with LB Camden through pre-application discussions to bring forward a mixed-use redevelopment of the St Pancras Hospital site and intend to submit a planning application in 2026 to include health, workspace, residential and retail uses alongside new open spaces and routes through the site. With regard to the formulation of the Draft Plan, representations have previously made to the:

- Draft Camden Site Allocations Local Plan Consultation (February 2020)
- Camden Site Allocations Document Update (December 2022)
- Camden Local Plan Review (January 2023)
- Draft New Camden Local Plan Regulation 18 Consultation Version (January 2024)

In this context, this letter sets out KCCLP’s representations on the policies, site allocations, and supporting text in the Draft Plan. In accordance with the Council’s Draft Local Plan Representation Form, we consider each policy against the following tests of soundness:



- Positively prepared – whether the policy is based on a strategy that seeks to meet objectively assessed development and infrastructure requirements;
- Justified – whether it is the most appropriate strategy, considered against reasonable alternatives and supported by a proportionate evidence base;
- Effective – whether the policy is deliverable over the plan period and founded on effective joint working on cross-boundary strategic priorities;
- Consistent with national policy – whether the policy aligns with the principles and requirements set out in national planning policy.

For each policy, we identify where we deem it to be unsound and set out proposed modifications to the policy wording and supporting text. These representations take into account the responses in the Council's Regulation 22(1)(c) Consultation Statement in relation to the Regulation 18 Consultation.

## Chapter 2: Development Strategy

Figure 03 of the Draft Plan is the 'Key Diagram' and identifies a number of 'Key Areas of Development'. This is replicated at a larger scale in Figure 06 of the Draft Plan – 'Key areas of development in South Camden'. This is shown in Figure 1 below:

Figure 1 – Draft Local Plan - Key areas of development in South Camden



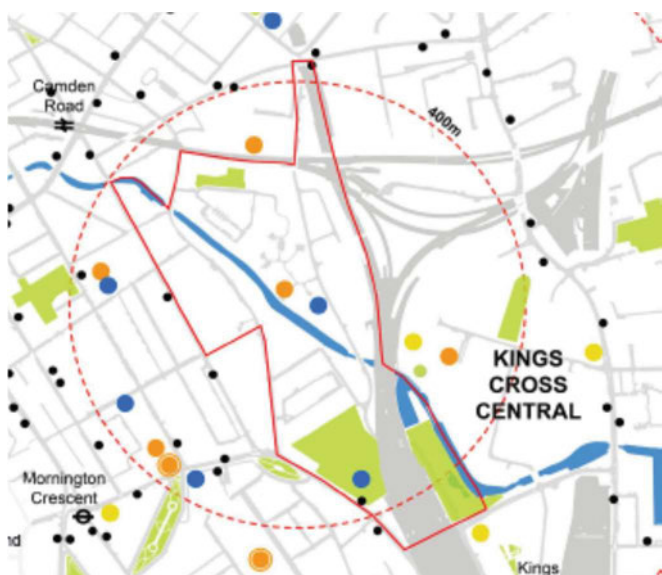
Paragraph 2.17 of the Draft Plan, which helps to describe the Spatial Strategy, identifies key areas of growth and includes Camley Street and St Pancras Way. This reflects the proposed Site Allocations identified around Camley Street and St Pancras Way in Figure 10 of the Draft Plan, as shown in Figure 2 below:

Figure 2 – Draft Local Plan – Site allocations in South Camden



Site Allocations S5, S6 and S21 are all located on or around Camley Street and Site Allocations S7, S8 (St Pancras Hospital), S10 and S22 on or around St Pancras Way. Part E of Draft Policy S1 (South Camden) also states that development in the King's Cross area will mainly be delivered through site allocations at Camley Street and St Pancras Way. For consistency within the Draft Plan, the Key Area of Development identifier shown in Figures 03 and 06 of the Draft Plan should therefore be extended to incorporate the St Pancras Way site allocations, in line with the Spatial Strategy and Draft Policy S1. This would also align with Canalside to Camley Street Supplementary Planning Document (SPD) (2021) area shown in Figure 3 below:

Figure 3 – Canalside to Camley Street SPD Area Boundary



On page 6, the Canalside to Camley Street SPD describes the area as offering significant opportunities for beneficial transformation with objectives including the more efficient, effective, better designed and sustainable use of land. As well as promoting a more intensive and sustainable mix of land uses at higher densities to optimise the use of land and deliver the uses and scale of development appropriate for the local context (pages 40/41). Part E of draft Policy S1 also references development being taken forward in accordance with the Canalside to Camley Street SPD. Again therefore, the Key Area of Development identifier shown in Figures 03 and 06 of the Draft Plan should be extended to be consistent with the Canalside to Camley Street SPD area.

### Chapter 3: South Camden

#### Site Allocation S8 – St Pancras Hospital

KCCLP strongly support the inclusion of St Pancras Hospital as a Site Allocation. However, as set out in their previous representations, certain elements of the allocation and supporting text remain unsound as they do not reflect: the site specific constraints; the economic and financial viability considerations for developments; and the supporting evidence base.

We also note that page 86 of the Council's Regulation 22(1)(c) Consultation Statement refers to proposals to update the Site Allocation to reflect updated pre-application discussions information where relevant. We look forward to engagement with the Local Plan team on this as pre-application discussions progress.

Table 1: Site Allocation S8 – St Pancras Hospital

Sound or unsound	Unsound
Soundness test/s	<p data-bbox="507 1529 694 1563"><u>Allocated Use</u></p> <p data-bbox="507 1597 1356 1933"><b>Not Justified</b> - The 'Development and Design Principles' include more active and engaging street frontages as well as the creation of new public routes. We fully support these principles. However, key to the success of these routes and spaces is their activation with ground floor uses which are open to the public. To facilitate this, the emerging proposals for the site include ground floor retail as well as food, drink and leisure uses. The vital placemaking tool that these uses provide should be clearly acknowledged in in the Allocated Use text</p> <p data-bbox="507 1977 619 2011"><u>Housing</u></p>

	<p><b>Not Justified and Consistency with National Policy</b> – The following areas of the Site Allocation text remain inconsistent with draft Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) and the text in other proposed site allocations:</p> <ul style="list-style-type: none"> <li>▪ The fifth bullet under the 'Context' section; and</li> <li>▪ Part 3 under the "Development and Design Principles".</li> </ul> <p>Part C.7 of draft Policy H2 states that in considering whether the self-contained housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will take into account the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as visitor accommodation, and any recommendations of an independent viability assessor commissioned to advise the Council.</p> <p>Every other site allocation in South Camden – Site Allocations S6, S7, S9, S10, S11, S12, S13, S14, S15, S16, S17, S18, S19 and S20 include a direct reference to draft policy H2. There is no clear or justified reason why Site Allocation S8 does not include this cross reference.</p> <p>Policies need to be realistically achievable and flexible and Paragraph 16 of the NPPF states that plans should be prepared in an aspirational yet deliverable way. As such, it is important to clarify in the site allocation text that the delivery of homes will be subject to site constraints and viability.</p> <p><b><u>Heritage</u></b></p> <p><b>Not Justified and Consistency with National Policy</b> – the reference in Development and Design Principle 4 to development must be designed to conserve or enhance existing heritage assets is a change to the Regulation 18 version of the Site Allocation, which stated <i>"retain and reuse key buildings of significant heritage or townscape value and the setting and tranquillity of St Pancras Old Church and gardens should be protected"</i>. It is unclear why this change has been made and the text is not consistent with Draft Plan policy D5 (Historic Environment) which refers to conserve and <u>where appropriate</u> enhance heritage assets [our underlining]. Policy D5 also sets out policy (as does the NPPF) to address instances where there is</p>
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	<p>loss of or harm to heritage assets. Development and Design Principle 4 is not required and the text should be removed.</p> <p><b><u>Water Tower</u></b></p> <p><b>Not Justified</b> – Reference to the water tower being a distinct landmark should be removed from the “Context” section. The Council note in their Consultation Statement that this reference reflects the Conservation Area appraisal but as set out previously, this appraisal was written 22 years ago in 2003. Since then, a number of buildings have already been demolished for the Oriel project (application ref. 2020/4825/P) and there has been significant change in character and context that is not accounted for in the appraisal. This also does reflect pre-application discussions on the Site to date, where in all proposals shared with LB Camden the water tower is removed. Development of the Site Allocation cannot proceed without. As such, this reference should be removed.</p> <p><b><u>Building Heights</u></b></p> <p><b>Not Justified</b> – No further evidence base has been produced relating to building heights and yet the approach to the height range still does not follow the methodology set out in the Building Heights Study evidence base document (January 2024). The table on page 212 of the Building Heights Study identifies St Pancras Hospital as reference AS05-04 and with a ‘Locational Significance’ of “District”. However, it only provides an ‘Approximate Upper Tall Building (“TB”) Ratio’ of up to 2x future Context Height (“CH”), not 3x CH up to 5x CH in line with Table 2.1. The Council has said in their Consultation Statement that Table 2.1 sets out “broad” categorisations, but it is not described as such in the text. Page 25 of the study specifically notes that: <i>“Table 2.1 sets out the tall building’s classification including the ways how different tall building types will be perceived and the impact they may have on the skyline.”</i></p> <p>The Site Allocation text is unclear how proposals will be considered where building heights over 45m are proposed. As such, this wording needs to be reviewed.</p>
<p><b>Proposed changes to policy</b></p> <p><i>Additional text in red and deleted text struck through</i></p>	<p><b><u>Allocated Use</u></b></p> <p><i>“Health, permanent self-contained homes, education, employment (including research and knowledge based uses, light industrial, maker spaces, offices), ancillary retail, food and beverage and leisure uses.”</i></p> <p><b><u>Housing</u></b></p>



	<p>Context (fifth bullet): <i>"The continued use of the site for health purposes is supported. The priority for the part of the site not occupied by health facilities is permanent self-contained homes, having regard to relevant Local Plan policies including Policy H2 Part C."</i></p> <p>Development and Design Principles Part 3: <i>"optimise the provision of permanent self-contained homes and ensure that the delivery of new permanent self-contained homes is prioritised over the provision of employment and other non-health related uses, having regard to relevant Local Plan policies including Policy H2 Part C."</i></p> <p><b><u>Heritage</u></b></p> <p><del><i>be designed to conserve or enhance existing heritage assets, including building, spaces and the adjacent St Pancras Gardens, recognising their contribution to the character of the conservation area, and seek to retain and restore buildings that make a positive contribution in accordance with Policy D5 (Historic Environment);</i></del></p> <p><b><u>Water Tower</u></b></p> <p>Context (second bullet): <i>"The appraisal notes that the east and west Hospital Wings and the Residence Building around the edge of the listed St Pancras Gardens are arguably the most cohesive and important collection of buildings on the site and that the water tower in the central section is a distinct landmark"</i></p> <p><b><u>Building Heights</u></b></p> <p>Development and Design Principles: <i>"The Camden Building Height Study identified this site as a location where tall buildings may be an appropriate form of development, with a 12m–45m considered the potentially appropriate height range identified in the study. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies. Additional height, above these potentially appropriate height ranges, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views"</i></p>
Proposed changes to supporting text	N/A

## Chapter 7: Meeting housing needs

Table 1: Policy H2 – Maximising the supply of self-contained housing from mixed-use schemes

Sound or unsound	Unsound
Soundness test/s	<p><b>Not Justified</b> - Draft Plan policy H2: 'Maximising the supply of self-contained housing from mixed-use schemes', proposes to extend the geographical area in which a contribution to permanent self-contained housing from development is applied. Adopted Local Plan policy H2 is applied to the 'Central London Area', however, Draft Plan policy H2 seeks to extend this to the whole of the 'South Camden' sub-area. Here, a self-contained housing target of 50% is applied to all additional floorspace proposed (GIA).</p> <p>Part B of the policy sets out a number of criteria in considering the target. However, no reference is made to the Indicative Housing Capacities set out in the Site Allocations. Given that the Council has undertaken a design assessment of the site allocations to inform the indicative capacities, this must be reflected in the list of considerations set out under policy H2 part B.</p>
Proposed changes to policy	Policy H2 B additional criteria: "9. the Indicative Housing Capacities set out in the Site Allocations"
Proposed changes to supporting text	N/A

## Chapter 8: Responding to the Climate Emergency

Table 2: Policy CC2 - Prioritising the retention of existing buildings

Sound or unsound	Unsound
Soundness test/s	<p><b>Not Positively Prepared</b> - Part A of the policy prioritises the repurposing and re-use of existing buildings over demolition. However, it is unclear how development on any site allocation could be optimised and viably delivered without demolition and rebuilding.</p> <p>We are concerned that if the priority to the repurposing and re-use of existing buildings is applied so strongly to existing buildings on site allocations, there will be issues with the Draft Plan meeting its development targets. The Draft Plan needs to make clear how this policy has been applied to the assessment of site allocations.</p>
Proposed changes to policy	Policy CC2 Part B:



	<p><i>“Developers considering the substantial demolition of existing buildings <b>outside of the site allocations</b> will be expected to undertake the following assessments, before progressing detailed proposals for submission.”</i></p> <p>Policy CC2 Part C:  <i>“<b>Outside of the Site Allocations</b> <del>the</del> the Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council’s satisfaction that:”</i></p>
<b>Proposed changes to supporting text</b>	N/A

## Chapter 10: Supporting Camden’s Communities

Table 3: Policy SC4 – Open Space

<b>Sound or unsound</b>	<b>Unsound</b>
<b>Soundness test/s</b>	<b>Not Justified</b> – the supporting text in paragraph 10.82 cross refers to the Camden Planning Guidance on open space in relation to calculating financial contributions. Paragraph 10.81 should also include a cross reference to the Camden Planning Guidance on open space which acknowledges that the 9sqm per occupier residential figure includes an allowance for play provision.
<b>Proposed changes to policy</b>	N/A
<b>Proposed changes to supporting text</b>	<p><i>“Where a development generates a need, the Council will give priority to securing suitable provision of play space for children and young people and an appropriate level of amenity space for the occupiers of a development. Play space provision will be expected to comply with the London Plan standards and designed to be welcoming, safe, accessible and inclusive for a range of ages and needs, in particular disabled and neurodiverse users. <b>Further guidance on how the level play provision is considered is provided in the Camden Planning Guidance on open space.</b></i></p>

## Chapter 12: Design and Heritage

Table 4: Policy D3 – Design of Housing

<b>Sound or unsound</b>	<b>Unsound</b>
<b>Soundness test/s</b>	<b>Not Justified</b> – Part A.1 of the policy states that the Council will expect housing development to meet the residential design standards set out in the London Plan and have regard to the

	<p>Supplementary Planning Guidance issued by the Mayor and the Council. Part A.3 of the policy states that the Council will expect all new homes to be dual aspect.</p> <p>In December 2024, the GLA published their Accelerating Housing Delivery Planning and Housing Practice Note. Paragraph 9.2 states that the Housing Design Standards London Plan Guidance should not be applied mechanistically in a way that inhibits delivery. It should also be applied in the context of the need to optimise site capacity in line with London Plan policy D3 and to maximise affordable housing provision in accordance with policy H4. Paragraph 9.3 goes onto emphasise that standard C4.1 sets out the intention that new homes should aim to be dual aspect while recognising that the appropriate and efficient design solution may involve some single aspect units. While the amount of single aspect units should be kept to a minimum, this will vary according to the specifics of each site, the design rationale for their use and the impact on key objectives.</p>
<b>Proposed changes to policy</b>	<p><i>A1. expect housing development to <del>meet</del> <b>be designed with regard to</b> the residential design standards set out in the London Plan and have regard to the Supplementary Planning Guidance issued by the Mayor and the Council;</i></p> <p><i><del>A3. expect all new homes to be dual aspect;</del></i></p>
<b>Proposed changes to supporting text</b>	N/A

## Summary

KCCLP welcome the opportunity to help shape future planning policies for Camden as a key stakeholder within the Borough. KCCLP have identified a number of Soundness issues with the Draft Plan and suggested amendments as set out in the tables above.

Given the importance of the matters our set out in these representations to the delivery of the St Pancras Hospital Site Allocation, we request to participate at the oral part of the examination, the examination hearings for each of the policies commented upon.

We would be grateful if you could keep us informed with regard to any future consultations or updates on the draft Local Plan.

Yours sincerely

*pp. Quod*

on behalf of Anthony Peter, Development Director at KCCLP

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Anthony"/>	<input type="text" value="Matthew"/>
Last Name	<input type="text" value="Peter"/>	<input type="text" value="Sherwood"/>
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:

*Our representations have been made in a separate letter. Within the letter, we have set out the representations on each policy, paragraph or site allocation in line the information required by this form. In each case we comment on soundness points (where relevant) and make clear our proposed modifications through marked-up changes to the text. To avoid duplication, we have not prepared a separate further form for each submission.*

*Representations have been made on the following Sections:*

*Chapter 3: South Camden*

*Chapter 7: Meeting housing needs*

*Chapter 8: Responding to the climate emergency*

*Chapter 10: Supporting Camden's communities*

*Chapter 12: Design and heritage*

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(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"/>
(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.

*Please refer to our separate letter.*

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

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

*Please refer to our separate letter.*

**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

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:

*KCCLP is most well-known for its mixed-use regeneration scheme at King's Cross and is committed to developing projects of scale in London that involve creating lasting, liveable places. As demonstrated at King's Cross, such projects require a long-term view to investment and returns, and significant investment in social infrastructure, services and public realm in order to create and maintain a flourishing community. KCCLP therefore have a significant interest in the policies of the Draft Plan and needs to be able to fully participate in the hearing sessions for those policies to which it has made representations.*

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



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

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

**Privacy Notice**

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

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

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

<b>11. Signature:</b>	<i>pp. Quod</i> on behalf of Anthony Peter, Development Director at KCCLP	<b>Date:</b>	<b>27.06.2025</b>
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# Notes to accompany the Representation Form

## 1. Introduction

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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:

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- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.

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- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

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

### • ***Positively prepared***

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



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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

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

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

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

Date: Fri, 27 Jun 2025 12:46:15 +0000

From: Natasha Wierre-Gore

To: PlanningPolicy

Subject: Objection about Regis Road recycling centre moving to Holmes Road NW5

---

Alongside the vast majority of the residents of the Inkerman conservation area, I am completely opposed to the recycling centre currently on Regis Road being moved to Holmes Road or anywhere closer to the conservation area and people's homes.

This idea may suit the rich developers wanted to make a fortune developing Regis Road but would be highly detrimental for all of us living and having our lived in the inkerman conservation area. Bringing a recycling centre so close to residents, a school, a police station and the high street seems mad. Also Camden has made such an effort to regulate traffic around the area that bringing a dump on Holmes Road would ruin all effort for safer, less polluted and cleaner streets! Also our properties would all lose substantial value which has been confirmed by multiple mortgage lenders.

The council should have the best interest of residents and putting recycling centre any closer than it is now to our homes would be letting us all down and negatively impacting many lives.

Thank you for considering mine and all my neighbours objections to this project,

Sincerely,

Natasha Wierre Gore

[redacted address]

[redacted postcode]

Date: Fri, 27 Jun 2025 13:49:01 +0100  
From: Aiysha Babatean  
To: [redacted]  
Subject: Draft local plan - Objection to Site Allocation C27 (Traveller site)

---

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

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

To whom it may concern,

My name is Aiysha Babatean and I live on [redacted] located near the proposed site.

I'd like to contest an application plan for a traveller site to be created next to Chalk Farm station. I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan.

This piece of green was recently planted with flowers and crops as part of a community school project. It's also an important piece of green for Constable house and the buildings nearby. It's a great place for the kids to kick about in and would be very missed by the community.

I also believe this area is a high flood risk and is therefore vulnerable.

Respectfully, this is not a suitable place for a traveller site and I would like to challenge this application as someone who lives in the neighbourhood.

Kind regards

Aiysha

Sent from my iPhone

Responder 527

Date: Fri, 27 Jun 2025 13:51:28 +0100

From: Madeleine Ho

To: [redacted]

Subject: Draft Local Plan - objection to site Allocation C27 ( Gypsy and Traveller Site)

---

Re... Camden Local Plan Proposed Submission draft ( Regulation 19,2025)

My Name is Madeleine Ho and I live in [redacted] [redacted postcode] located near the proposed site.

I want to object to the proposed allocation of site C27 Land East of Constable House NW3 3 QA for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft Regulation 19. On the ground of the following issues such us more unnecessary traffic , pollution, noises, extra litters etc.....  
I hope the Planning Team will consider to remove the planning of the site C27.

Regards

Madeleine Ho.

Responder 528

Date: Fri, 27 Jun 2025 12:51:33 +0000

From: Simon Haslam

To: PlanningPolicy

Subject: re: Camden Local Plan – Proposed Submission Draft 2025 - Basement  
Force Ltd submission

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

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

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

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

This form has two parts –

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

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


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

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

#### 1. Personal Details\*

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

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

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



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

Name or Organisation: **Basement Force Ltd**

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

Documents can be found at the following links:

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

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

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

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

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

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

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	Yes
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	Yes
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	Yes
(4) Consistent with national policy	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 support the ASUC representation regarding Policy D6 Basements

I would like to add that our company employs 90 (ninety) people who work in the sector and we have and do work in Camden.

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

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 have a good understanding of the matters that should be put before the Inspector and believe that I would be able to add to the Examination in Public.

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

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

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

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Date: Fri, 27 Jun 2025 12:53:28 +0000

From: william pelton

To: PlanningPolicy

Subject: Objection about Regis Road recycling centre moving to Holmes Road NW5

---

Alongside the vast majority of the residents of the [redacted] conservation area, I am completely opposed to the recycling centre currently on Regis Road being moved to Holmes Road or anywhere closer to the conservation area and people's homes.

This idea may suit the rich developers wanted to make a fortune developing Regis Road but would be highly detrimental for all of us living and having our lived in the inkerman conservation area. Bringing a recycling centre so close to residents, a school, a police station and the high street seems mad. Also Camden has made such an effort to regulate traffic around the area that bringing a dump on Holmes Road would ruin all effort for safer, less polluted and cleaner streets! Also our properties would all lose substantial value which has been confirmed by multiple mortgage lenders.

The council should have the best interest of residents and putting recycling centre any closer than it is now to our homes would be letting us all down and negatively impacting many lives.

Thank you for considering mine and all my neighbours objections to this project,

Sincerely,

William Pelton  
[redacted address]  
[redacted postcode]

Date: Fri, 27 Jun 2025 12:56:57 +0000

From: Herman Monster

To: planningpolicy@camden.gov.uk

Subject: RE: Gypsy and Traveler Site Identification Study as it relates to Constable house

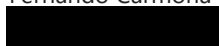
---

I am writing to express my strong opposition to the proposed development of land east of Constable House, Title No: NGL454800 in the GTISIS, as a gypsy and traveller site. While I understand the importance of providing suitable accommodation for all communities, I believe that such development in this particular area would have significant negative impacts on the local environment, community cohesion, and infrastructure.

This land is valuable for its current use, as children from the estate use it to play and ride bikes in relative safety, away from street traffic and parking structure. Turning it into a traveller site would not only take that away from the children mentioned, including my own, but also certainly lead to increased traffic and noise. I am concerned about how this development might affect the character of our community and the well-being of residents who live nearby.

I urge you to consider alternative locations that would better accommodate the needs of gypsy and traveller communities without compromising the integrity of our local area. Thank you for taking my concerns into account.

Regards,  
Fernando Carmona





Date: Fri, 27 Jun 2025 13:58:48 +0100

From: Stephen Lennard

To: [redacted]

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

---

Greetings LB Camden

1. Terrific that LB Camden wants to do its best for a marginalised and under-resourced community.
2. No problem that the proposal is sited within an area of predominantly private housing.
3. But what on earth leads to the conclusion that taking away the scarce outside play space adjacent to Constable House is an acceptable price to pay?
4. Of course, the amenity of Primrose Hill is only a short walk away but the users of the play space either do not or should not be encouraged to make that journey unaccompanied. But they can and do use enthusiastically the area right next to their home.
5. It is inconceivable that planning consent for further development of that very small site for any residential or commercial purpose would be granted - at the expense of losing that precious play area.
6. I am not competent to comment on flood risk or access issues – and being overlooked/loss of privacy is a feature of inner London living; I am unpersuaded those are of significant concern.
7. The overriding objection which should prevail is the loss of open play space.
8. Do not therefore progress this site as a potential solution.

Stephen Lennard

Date: Fri, 27 Jun 2025 12:59:00 +0000  
From: Nick Blackford  
To: PlanningPolicy  
Subject: Objection to Proposed Recycling Centre on Holmes Road

---

Dear Planning Policy Team,  
I am writing to formally object to the proposed Recycling Centre on Holmes Road.

Based on assessments by EEMC and Liz Syms of Connect Mortgages (a broker network with over 300 members) the construction of this facility will significantly impact property values within a 200-meter radius. Streets including Raglan Street, Inkerman Road, Alma Street, Cathcart Street, Grafton Road, Willes Road, and Holmes Road itself are expected to suffer from devaluation. Additionally, homeowners in these areas may face higher mortgage costs due to increased lending risk.

It is striking that both independent mortgage assessments align in their concerns. The fact that the developer has chosen not to place this centre near their own new housing development raises questions about the suitability of the Holmes Road site.

This plan risks undermining the character and value of the Inkerman area and the well-being of its residents. I urge you to reconsider this proposal in light of its financial and social consequences.  
Yours sincerely,

Nick Blackford

Date: Fri, 27 Jun 2025 14:02:55 +0100

From: Claire Vandervoort

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

Subject: Objection to Site Allocation Proposal C27 (Gypsy and Traveller Site)

---

Dear Kemi, Nasrine, Rebecca and the Camden Council Planning Committee,

As a local resident, I'm writing to express my strong concerns about the proposed allocation of Site C27 (Land east of Constable House) and to respectfully request that the Planning Inspector remove it from the Camden Local Plan.

Here are the key reasons why I believe Site C27 is not a suitable location:

### **1. Loss of a valued community green space**

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

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

Its loss would go against:

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

### **2. Overlooking and Privacy Concerns**

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

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

This conflicts with:

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

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

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

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

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

#### **4. Access Issues and Undeliverability**

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

It fails to meet:

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

#### **5. A Lack of Transparency in the Selection Process**

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 sites. Only two made it into the Regulation 19 Draft Plan, but no clear explanation was given as to why. What's more, Site C27 was not included in previous consultation rounds. Many local residents, myself included, only learned of its proposed allocation in May 2025 - too late for proper engagement. This lack of openness undermines public trust and appears to conflict with NPPF Paragraph 16(d), which requires clear justification and transparency in plan-making.

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

The AECOM methodology filtered out sites that:

1. Are within 18m of 4+ storey buildings
2. Are used as informal amenity/play space
3. Have identified flood risk
4. Lack safe vehicle access

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

#### **7. Other, More Suitable Options Were Dismissed**

Out of the 21 sites shortlisted, we've been given no meaningful explanation for why 19 were rejected and why C27 was carried forward, despite its clear problems with access, amenity loss and flood risk. The April 2025 Site Selection Topic Paper mentions these same issues as reasons for excluding other sites, yet offers no comparative analysis or scoring to justify C27's inclusion.

The plan has therefore not met the NPPF tests of:

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

#### **Conclusion and Requested Action**

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

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

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

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

I hope the Council and Inspectorate will commit to reconsidering more suitable alternatives, through a transparent process that meaningfully includes local residents. Please let me know if more information is required.

I look forward to hearing from you on the next steps.

Kindly,  
Claire Vandervoort

Responder 534


Date: Fri, 27 Jun 2025 13:04:53 +0000

From: George Fairlie

To: PlanningPolicy

Subject: Representations to the Regulation 19 Camden Local Plan - General Projects

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27 June 2025

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

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

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

Dear Robert,

**Representations to the Regulation 19 Camden Local Plan**

We write on behalf of our Client, General Projects Limited, to make representations to the regulation 19 consultation of the Proposed Submission Draft of the Draft Local Plan, published in April 2025 (the “Plan”). Thank you for inviting comments on the Plan. General Projects are a key stakeholder in the Borough and welcome many of the new policies in the Plan and support its aspirations to deliver growth across the Borough.

We would further endorse many of the points raised by the London Property Alliance’s Camden Working Group which has made representations on behalf of industry.

General Projects

General Projects is a contemporary real estate developer. They design and deliver creative, inspiring and experiential buildings for an ambitious new generation with a particular focus on commerce, culture, technology and sustainability, always seeking to create social, local and environmental benefits through each and every development. Retrofit first is a key design mantra for General Projects and is always the starting point for development projects.

General Projects are working on developing several sites within the Borough including live pre-application and planning applications schemes including:-

- Holborn Telephone Exchange: a new boutique hotel to repurpose the building and make it publicly accessible for the first time in it’s history, in the pre-application stage;
- Highgate Studios: An opportunity for a mix of uses as commercial and residential (including non-self-contained living) to deliver a significant amount of commercial floorspace supporting business, delivering additional jobs, affordable workspace and creative uses, whilst upgrading the public realm with high quality landscaping.





- Fox Court: An exemplary office retention and extension scheme, securing the transformation of the existing building to meet the demands of contemporary office tenants. Application currently undergoing determination.

We look forward to continuing working with Camden to deliver responsible and deliverable development to create exemplar places.

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

These representations relate to the overarching spatial strategies for the various sub-areas as well as general commentary and suggested alterations to the development management policies which are largely an update to the adopted Local Plan. Detailed commentary on relevant site allocations including a request for a new site allocation is split by sites.

We also note that the Greater London Authority are in the process of preparing a new London Plan with the "towards a new London Plan" consultation running almost in parallel with Camden's consultation.

We would note the tone of that consultation seeks to make London's Spatial Development Strategy more high level with a major emphasis on the deliverability of development, primarily to address the Capital's housing crisis but also to ensure that economic growth is facilitated. The consultation also seeks to manage the Central Activities Zone ("CAZ") and how its specialist functions can be supported as one of the most well connected physical areas in the country.

#### Overall Development Strategy

The approach to combine site allocations and a series of locational growth strategies and development priorities in the Plan are generally supported.

The strategic objectives of draft policy DS1 is fully supported. Many of the area specific requirements at the overarching sub-areas policies could be consolidated into a single borough wide policy as many parts of draft policies S1, C1, W1 and N1 are overly repetitive.

Draft policy S1 is broadly supported. It should recognise that unallocated sites have significant potential to deliver growth. The policy should provide a specific growth target for employment and economy in terms of office floorspace in order for the policy to be specific and effective. It should recognise the role that offices can have in relation to the Knowledge Quarter. Growth in this area requires more than just lab space to thrive. Part I and J should be amended to recognise this.

The policy should also recognise the importance of the visitor economy in this sub-area. The CAZ is a vital growth area (and is also noted in draft policy IEX as being the most appropriate location for new hotels).

The commitment to the delivery of infrastructure in part U of the draft policy is strongly supported.



With the south Camden sub-area, we consider that the Holborn Telephone Exchange site should be included as a new allocation for hotel use. This is discussed later in these representations.

Draft policy C1 is also broadly supported, particularly the infrastructure identified at part O. Highgate Studios should be allocated for a mix of commercial and residential products (including non-self contained living products), particularly given its relationship to the neighbouring Murphy's Site (draft allocation C3) which is allocated for development. This is discussed later in these representations.

Draft policy W1 is also broadly supported including the infrastructure identified at part L. We have made comments on draft allocation W4 later in these representations.

### Housing

Our substantive comment relating to this chapter of the Plan is that the mixed use policy is not justified or fit for purpose. The Plan should allocate sites for housing and employment separately in order to lead to more effective delivery of housing rather than requiring individual commercial applications to make small contributions to housing.

Sites should be allocated for wholly residential or commercial uses, particularly in the South Camden sub-area to avoid situations where small amounts of housing are a policy requirement where there is modest capacity for growth in office or employment floorspace. This coupled with a relaxation of the employment policies would lead to more meaningful delivery of a mix of uses across the Borough with some sites in the south Camden sub-area which are in an existing employment use would be better or more readily adaptable to residential than new high quality office floorspace.

This approach would give greater certainty and remove what is often an onerous requirement on commercial development. Some larger sites certainly have capacity to provide multiple buildings but many do not. Allocating specific sites for more substantial amounts of commercial development and housing development would be more effective than the requirements of policy H2 on all sites in the defined areas.

It is considered that policy H2 is onerous and should be deleted. If it is to remain, as a minimum the following amendments need to be made:-

- It should recognise that the delivery of a small number of homes can significantly compromise the delivery of commercial buildings and that a payment in lieu is a much more meaningful contribution for housing that can be pooled and ringfenced for Camden's Community Investment Programme.
- The policy should make clear at what threshold a payment in lieu of the affordable component for housing as part of a mix of uses is acceptable (in line with the adopted policy H2 and H4). Certainty is fundamental and the policy as drafted allows for a significant amount of variation and negotiation which makes decision taking less clear.
- Whilst part C of the draft policy allows for a range of considerations to be taken into account as to whether housing should be provided at all. This should be the first gateway of the policy with an appraisal of whether the site can reasonably provide housing being the first step before setting a floorspace target based on uplift of all uses. This will lead to the arbitrary delivery of small numbers of homes which are often not high quality.



- The relationship to policy H4 and the requirement to provide market and affordable housing needs to be clearer. The supporting text at paragraph 7.54 makes a reference to a threshold of 10 homes and a payment in lieu, which is not in line with draft policy H4 in the plan.
- The policies map should show the areas in which the mixed use policy applies for ease and completeness. The removal of the Central London Area designation and the proposed definition at paragraph 7.39 is unclear and unnecessarily complicated.

Policy H4 of the Local Plan is generally supported (noting the position on the mixed use policy and securing housing contributions generally from non-residential development).

The primary issue with the policy is the lack of clarity about when a payment in lieu will be acceptable. The policy should be amended to clarify when the Council will consider this acceptable or as a minimum provide a set of criteria for it to be assessed against to make the policy more specific and effective.

Part B(10) of the draft policy stipulates that a payment in lieu is “exceptional” and this should not be the case, particularly as the “distinctive criteria” for smaller developments of fewer than 15 units at part B(1) of the draft policy are not defined or discussed in the supporting text and would not be feasible to deliver on-site affordable housing.

Whilst having a flexible policy approach to negotiating affordable housing can be useful, it is considered that this policy is too uncertain to be effective and is therefore not sound. There are significant challenges in delivering affordable housing across industry, particularly with Registerer Providers (“RP”) who are responsible for delivering and managing affordable housing. There is virtually no scenario where an RP will take on or manage small amounts of affordable housing with the market indicating that a minimum of around 20 dwellings is the limit of what is feasible to for an RP to effectively manage.

The policy should make clear that payments in lieu of affordable housing are acceptable where the capacity or percentage of affordable housing is below 15 units (in line with part B(1) of the draft policy) is acceptable as the delivery of on-site affordable units at this level is not likely to be manageable by an RP.

The retention of flexibility in dwelling mix at draft policy H7 is supported, particularly as in retrofit scenarios it is not always possible to achieve a variety of dwelling sizes.

The new policy approach to purpose built student accommodation and shared living is supported in supporting the delivery of housing.

### Climate Change

General Projects recognise and fully align with Camden on the need to respond to climate change in the built environment sector. Draft policies CC1 and CC2 of the Plan are supported. Draft policy CC5 of the Plan should recognise that responsible retrofit also involves finding the right land use for an existing building and that this should take priority or at the very least be a consideration in the application of the land uses policies contained within the Plan.



Draft policy CC7 of the Plan should recognise there are challenges associated with connecting to a variety of existing heat networks which rely on fossil fuel and that it is more sustainable for on-building all electric plant to be prioritised in the short term until such a time that the heat networks have been decarbonised.

### Inclusive Economy

The strategic aspirations of draft policy IE1 are supported. Draft policy IE2 is broadly supported. Part C of the policy is considered to be overly restrictive. There will be many instances and office sub-market areas where a 12 month marketing period is onerous and unnecessary. There are vast parts of the mid-town area where even new office floorspace is not commercially attractive to occupiers, and in many instances the buildings are not easily or readily adaptable into the highest quality offices that occupiers demand.

In parallel with our comments on policy H2 and seeking a mix of uses across the Borough, it is considered that there could be many instances where buildings could be more easily retrofitted from office to residential, hotel or otherwise without the need for such extensive marketing processes. This could be introduced as a “retrofit fast track” which is being similarly proposed by the City of London’s City Plan 2040 which has recently concluded examination in public.

The revisions to the affordable workspace approach at draft policy IE4 are welcomed, particularly the change from gross to net form the previous regulation 18 consultation draft of the Plan. It is welcomed that there is flexibility in the level and depth of discount in recognition that a range of sizes and costs can be beneficial in supporting the inclusive economy. It is also welcomed that a payment in lieu of affordable workspace option is available in appropriate circumstances, provided that these are viable and do not compromise delivery of development.

Draft policy IE5 is also supported as it recognises the importance of hotels and their role in supporting economic growth through London’s wider visitor economy.

### Site Allocations

#### **Proposed New Allocation: Highgate Studios**

We have used the previous call for sites form to provide information in support of an allocation for the Highgate Studios, Highgate Road, London, NW5 1TL (easting: 528721, northing: 185526).

- General Projects are acting as the development manager for the Site and it is owned freehold by La Salle.
- The current lawful use of the site is offices with some ancillary retail (Class E).
- The most recent planning application (ref. 2023/1804/P) achieved resolution to grant permission on 14<sup>th</sup> November 2024 and is currently awaiting the S106 to be finalised.
- The existing car parks are expected to become available for development within 3 years.
- The existing underutilised car parks are considered to be appropriate for a range of commercial and residential uses including purpose built shared living, student accommodation and traditional housing uses. It is capable of a capacity of approximately 7-storeys.
- The site’s constraints do not prejudice site suitability, availability or achievability.



The Murphy site, located adjacent to Highgate Studios, forms part of the Kentish Town Industry Area, which is designated as a Locally Significant Industrial Site (LSIS) under the London Plan. General Projects acknowledges that the draft Local Plan supports the mixed-use redevelopment of the Murphy site for housing, business, and industrial uses. Given the close relationship between the two sites, General Projects believes that similar mixed-use redevelopment should also be supported at Highgate Studios, to allow a mix of uses to complement one another and contribute to meeting housing need in this location.

#### **Proposed New Allocation: Holborn Telephone Exchange**

We have used the previous call for sites form to provide information in support of an allocation for the Holborn Telephone Exchange, 268-270 High Holborn, London, WC1V 7EE (easting: 530740, northing: 181549).

- General Projects are acting as the development manager for the Site and it is owned freehold by Holborn TE Jersey Property Unit Trust.
- The current lawful use of the site is a telephone exchange (Sui Generis).
- The most recent planning application was granted on 08 January 2016 (ref. 2015/5927/P) but was not implemented.
- The site is expected to become available for development within 5 years. BT are closing down the telephone exchange and retaining some infrastructure at the ground and lower floors with the upper levels being redundant and available for a change of use.
- The site is considered to be appropriate for hotel (Class C1) use within a retained and adapted structure. It is capable of upwards of extension of approximately three storeys.
- The site's constraints do not prejudice site suitability, availability or achievability.

Pre-application discussions are underway and a Planning Performance Agreement has been agreed and entered into. It is not considered that the site is fit for purpose in a new office use given then design constraints of the building (natural light and proximity to neighbours) would lend it to high quality grade A office accommodation within a retained building.

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

Please contact Oliver Sheppard, Liam Lawson Jones or George Fairlie of this office to discuss further.

Yours faithfully

**DP9 Ltd.**

Date: Fri, 27 Jun 2025 13:08:03 +0000  
From: Charlotte Regan  
To: PlanningPolicy  
Subject: Objection to Site Allocation C27: Land East of Constable House, Adelaide Road (Traveller Site Proposal)

---

Dear Camden Planning Policy Team,

I am writing to formally object to the inclusion of **Site Allocation C27**, the land adjacent to Constable House on Adelaide Road, as a proposed location for a Gypsy and Traveller site in the draft Camden Local Plan.

I respectfully request that this site be **removed from**:

- Chapter 4: Central Camden (Table 5)
- Chapter 7: Meeting Housing Needs (Policy H11)
- The Draft Policies Map and Site Allocation Schedule

**Key Grounds for Objection:**

**1. Excessive Public Exposure:**

This is an extremely visible and busy site, located directly beside Chalk Farm Station and a major pedestrian route to Primrose Hill. It offers no refuge from the noise, foot traffic, or exposure to the public.

**2. Severe Privacy Limitations:**

The plot is directly overlooked by multiple residential blocks including Constable House, The Etons, and Primrose House. Any families accommodated here would be under constant observation from nearby homes, which raises concerns about dignity, privacy, and wellbeing.

**3. Loss of a Rare Green Buffer:**

This small but valuable green patch provides one of the few remaining areas of informal open space in our immediate urban area. Its removal would negatively affect local quality of life.

**4. Community Investment Ignored:**

Local volunteers and children have invested time and effort into planting wildflowers and fruit trees as part of the **CommuniTrees** initiative. The proposed site allocation would erase this community work entirely.

**5. Child-Friendly Space at Risk:**

Local children currently use the site as an informal playground. There are no comparable nearby spaces for play, and the removal of this area would be a serious loss for young families.



**6. Traffic and Emergency Access Concerns:**

Access to the site would cut across a residential area with limited road width and poor turning space. This raises red flags for service vehicle access and general safety for both new occupants and current residents.

**7. Flood Risk:**

The land has seen repeated flooding in recent years, especially around the children's play area. Developing on it risks exacerbating drainage issues for the entire area.

**8. Lack of Community Consultation:**

There has been no meaningful engagement with those of us who live here. A decision of this magnitude should not move forward without proper dialogue with local residents.

For these reasons, I believe Site C27 is wholly unsuitable for the proposed use and urge the Council to remove it from the Camden Local Plan.

Thank you for your time and consideration.

Sincerely,  
Charlotte Regan

Date: Fri, 27 Jun 2025 13:08:37 +0000  
From: Peter Edgar  
To: PlanningPolicy  
Subject: Draft New Camden Local Plan - The Arch Co Representations

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*Partner*  
Newmark Planning and Development  
**NEWMARK**



**Please consider the environment before printing this email - we are ISO 14001 certified.**

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Planning Policy  
Camden Town Hall  
Judd Street  
London  
WC1H 8EQ

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

Our ref: PED/SRO/U0028089

27 June 2025

Dear Sirs

## Camden Local Plan Proposed Submission Draft (April 2025) – Consultation

### Response on behalf of The Arch Company

We write on behalf of The Arch Company Properties Limited ('The Arch Company') to respond to the consultation on the London Borough of Camden's Local Plan Proposed Submission Draft (April 2025).

As the largest landlord to small businesses in the UK, The Arch Company's portfolio plays a vital role in ensuring that small businesses have access to the facilities they need to start-up and scale-up. The Arch Company portfolio provides a range of options for the types and characteristics of spaces required by businesses and organisations.

Specifically in the London Borough of Camden, The Arch Company has identified significant capital investments across their portfolio in Camden, specifically to bring vacant commercial and residential space back into use for residents and small businesses. These projects include long term vacant properties and restoration of heritage assets, revitalising neglected legacy assets whilst improving streetscapes within the local community. The Arch Company is actively working with stakeholders including the Railway Heritage Trust, Network Rail and existing small business customers, to ensure that their projects in Camden are aligned with the wider needs of the areas in which The Arch Company creates space.

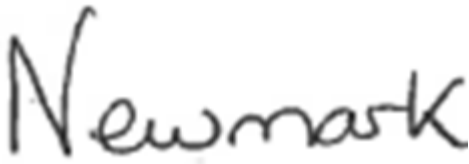
The representations have been appended to this letter. These have been structured as follows:

1. We have provided a brief background to The Arch Company in London and its economic and social impact;
2. We have provided an overview of The Arch Company's assets specifically within the London Borough of Camden;
3. We have set out what we consider to be the main planning challenges restricting rail arch development; and

4. In the context of the above points, we have provided representations to relevant sections of the Camden Local Plan Proposed Submission Draft (April 2025)

The Arch Company looks forward to continued involvement in the Local Plan preparation process. Should it be helpful to discuss any aspect of these representations further, please do not hesitate to contact Peter Edgar or Suzanne Thurtle of this office.

Yours sincerely

A handwritten signature in dark ink that reads "Newmark". The letters are cursive and slightly slanted to the right.

**Newmark Planning & Development**

Three horizontal black bars of varying lengths, used to redact contact information such as a phone number, email address, or website.

Enc. The Arch Company – Camden Local Plan Proposed Submission Draft (April 2025) Representations

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# Camden Local Plan Proposed Submission Draft – The Arch Company

## The Arch Company – Camden Local Plan Proposed Submission Draft (April 2025)

### Representations

1. As a major landowner in the London Borough of Camden ('LBC'), The Arch Company welcomes the opportunity to provide comments on the Camden Local Plan Proposed Submission Draft (April 2025) ('the draft Local Plan').

### The Arch Company Properties Limited in London

2. The Arch Company is one of the largest providers of space to small businesses in the capital with c.12m sq ft of lettable floorspace including 3,200 railway arches, former railway buildings and parcels of land, of which 2,300 are currently occupied. The Arch Company was created in 2019 following the sale of much of Network Rail's commercial estate. The Arch Company's sole purpose is to make space for businesses to thrive.
3. Ensuring these arch spaces are occupied with active employment uses including a range of uses classes depending on location, is more critical than ever now that London has experienced the loss of so much of its supply of smaller commercial spaces and the need to meet changing demands grows.
4. The Arch Company's spaces are home to an array of different businesses across London, almost all of them SMEs. Over half of its spaces are used for light industrial production, storage or distribution purposes. Historic uses for arches such as vehicle service and repair have in recent years been complemented by creative industries, food and drinks production and hospitality uses. The ever-changing demand from such a variety of businesses for new spaces in the arches mirrors and reflects the continuously evolving and diverse nature of London's economy.
5. Arch-based businesses provide important employment opportunities for people on low and middle incomes. A higher proportion of occupations including skilled trades, sales and customer services, and machine operatives can be found in arch-based businesses compared to the other parts of London's business community. In the case of machine operatives, the proportion of those working in railway arches is double the London average.

### The Arch Company Properties Limited in Camden

6. Specifically, within Camden, the company owns circa 60 arches which run through Camden. The Arch Company has identified significant capital investments across their portfolio in Camden, specifically to bring vacant commercial and residential space back into use for residents and small businesses. These projects include long term vacant properties and restoration of heritage assets, revitalising neglected legacy assets whilst improving streetscapes within the local community. The Arch Company is actively working with stakeholders including the Railway Heritage Trust, Network Rail and existing small business customers, to ensure that their projects in Camden are aligned with the wider needs of the areas in which The Arch Company creates space.

### Planning Policy Challenges for Rail Arch Development

7. The current planning regime too often acts as a brake on economic growth. A consistent and responsive planning system that can offer more certainty to investors in business space such as the Arch Company will ultimately increase the speed and amount of private investment going into London's built environment, creating increased capacity for enterprise and thus generate further economic growth.
8. Many modern-day occupiers within the arches do not and cannot operate under 'traditional' industrial use classes (Use Class B2/B8). This is truer of smaller businesses, whose entrepreneurial owners need to adapt business models to meet local needs, providing their services in multiple innovative ways. Whilst there are some distributors and car repair workshops in the portfolio, increasingly the Arch Company is seeing a wider range of quasi-industrial occupiers whose operations fall



outside of Class B2/B8 – for example a brewer who wishes to make beer on the premises, sell beer as a retail product and provide a small area for patrons to drink beer on/outside of the premises. Other comparable uses include spaces for creative industries, like photography studios, or elsewhere spaces for e-bike couriers.

9. This issue is not only unique to industrial uses, and many of The Arch Company's occupiers operate uses which would appear to straddle some planning use classes, particularly those prior to the introduction of Class E. For example, bakeries and coffee roasteries which have both commercial processes and a retail function. Flexibility is therefore required in the Local Plan to enable growth and employment opportunities arising from a range of use classes.
10. The Arch Co are concerned about public realm proposals adjacent to viaducts which compromise the continued operations of occupiers of the arches and adversely affect the public highway / railway network. This is particularly the case for industrial/semi-industrial occupiers who need some vehicular access for their operations (deliveries etc.). If the economic and social potential of the railway arches is to be optimised, then these operational requirements must be considered carefully and allowed for when public realm and/or active frontage place-making plans are brought forward.
11. Other planning policy requirements are often applied in blanket fashion with little or no consideration to the spatial constraints of arches and the limited ability to carry out works above/close to arches due to Network Rail ownership/operation restrictions. This is in respect of matters such as cycle parking, energy, open space, greening, biodiversity targets etc. One particular issue is affordable workspace policies. There should be an acknowledgement of these challenges and policy requirements should be applied with a degree of flexibility so that gains can be achieved (where possible) but this is not at the expense of development coming forward.
12. Enabling appropriate flexible temporary and meanwhile uses in arches should be strongly encouraged, where feasible. The Arch Company have had successful experiences with vacant stock where charities and small businesses have been able to temporarily utilise units with minor works in some cases for no or little rent. This prevents units from sitting vacant and derelict.
13. In summary, the key 'policy asks' by The Arch Co which are reflected in these representations are as follows:
  - a. **Flexibility on loss of existing industrial use**
  - b. **Flexibility on proposed land uses to meet needs of modern occupiers**
  - c. **Operational requirements of arch occupiers should not be compromised in any public realm/active frontage proposals**
  - d. **Flexibility and proportionality in applying planning policy requirements**
  - e. **Policy support for temporary and meanwhile uses**

## Draft Local Plan Representations

14. We set out below comments on behalf of The Arch Company on the draft Local Plan policies, and have made suggestions to changes to policy wording, both where points of clarification are required and where it is considered that amendments are required in order to meet the tests of soundness set out at paragraph 36 of the NPPF.

### Chapter 8 – Responding to the climate emergency

15. The Arch Company are retrofitters, not developers, with most of their spaces in the heart of urban communities, following a pattern of continual reuse and repurpose. The Arch Company are uniquely placed to minimise environmental footprint whilst maximising positive economic and social impact. A recent study showed a light industrial unit in a refurbished railway arch has less than half the embodied carbon of equivalent new build space.
16. The draft Local Plan's ambition to make Camden a green, clean, vibrant, accessible and sustainable place is therefore closely aligned with The Arch Company's sustainable nature. Whilst The Arch Company supports the underlying objectives

of the policies in Chapter 8, there are some specific points which need to be addressed.

#### **Policy CC1 – Responding to the climate emergency**

17. Part (B) requires a Sustainability Statement to be provided for schemes providing 500 sqm + of additional or re-provided floorspace. This may capture rail arch development. In principle, this is accepted but it is requested that either within supporting policy text, or specific Planning Guidance that the unique characteristics of railway arches are acknowledged. The ability for such spaces to provide green infrastructure for example is limited/not possible due to spatial requirements and operational requirements particularly arising from National Rail activities.

#### **Policy CC5 – Sustainability improvements to existing buildings**

18. Part (C) should be amended as follows:

*“To improve the sustainability of existing buildings, we strongly encourage schemes that alter, extend and/or convert existing buildings to incorporate one or more of the following measures, **where feasible and appropriate to the scale or nature of the proposal.**”*

19. Installing PV panels for railway arches for example will often not be possible due to lack of roof space due to Network Rail operational requirements. The policy should be appropriately flexibly worded to ensure it is effective.

#### **Policy CC6 – Energy use and the generation of renewable energy**

20. The standards set out within part (C) and (D) of Policy CC6 are too restrictive and should be amended to incorporate flexibility. As noted above, the re-use of railway arch space inherently has low ‘upfront embodied carbon’ emissions given the retrofit only approach. When accommodating new uses, The Arch Company will of course consider potential sustainability improvements, but these can be very limited due to spatial restrictions, occupier requirements and the overarching requirements of Network Rail. It may not always be possible, for example, for development to be fossil fuel free and use low carbon heat. The NPPF definition of sustainable development includes economic and social strands, as well as environmental. The draft Local Plan’s sustainability policies must be drafted in a manner which balances all three priorities.

#### **Policy CC11 – Sustainable drainage**

21. Parts (A), (C) and (D) of the Policy should be amended to refer to major ‘new build’ development. Incorporating SuDS into rail arch development will, in most cases, simply not be possible. Basements (which themselves would incur a carbon spend) could not be built and The Arch Company does not usually own the land surrounding the railway arch. The specific challenges of railway arches should also be recognised in the supporting policy text.

#### **Chapter 9 – Growing a successful and inclusive economy**

22. The Arch Company strongly supports the aim of the policies to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to, and share in, the borough’s economic growth.
23. Given the importance of railway arches to Camden’s local economy, and the unique planning challenges faced by such spaces, we consider it would be appropriate for the introductory paragraphs of chapter 9 to recognise the role of railway arches and the need for flexibility to ensure that they can maximise benefit for the local economy.

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

24. The Arch Company strongly supports the overarching objective of the draft Policy to “secure a strong, diverse, sustainable and inclusive economy in Camden”.
25. Part (4) of the policy resists the loss of viable employment floorspace. The Arch Co requests that this policy is applied flexibly to commercial uses in arch spaces to create an inclusive economy.
26. Part (6) requires the submission of employment and training strategies for major schemes and for office/industrial refurbishment schemes of over 3,000 sqm floorspace (gross). Whilst The Arch Company supports the principle of improving

access to employment across the borough, this needs to be balanced against the business needs of the occupier and the wider economic objective of the draft Plan. Dictating employment requirements for SMEs in arches is unlikely to be possible for most arch-based businesses. In order to avoid an unintended consequence of disincentivising SME occupation in arches, we suggest that the draft Local Plan and/or associated guidance builds in appropriate flexibility for employment and training standards to be applied proportionally and sensibly.

27. The Arch Co supports the promotion of meanwhile and temporary uses in Part (8) but notes that they should not be required.

#### **Policy IE2 – Offices**

28. The Arch Company consider that as drafted, part (C) of the Policy is too restrictive. Arch space can be used as office space by small businesses, but often this need is relatively short-term as the business grows/moves on. Once these occupiers move on, The Arch Company would like the flexibility to be able to let the unit to a range of occupiers, not just office occupiers. Policy IE2 (C) acts as a disincentive for The Arch Company to create new office space within the arches in the borough.
29. Office space within railway arches should be explicitly excluded from part (C) of Policy IE2, to enable such space to respond to market demand and local need.

#### **Policy IE3 – Industry**

30. Arches historically were used often for traditional 'industrial' purposes like vehicle service and repair and storage. Whilst these uses do still exist within arches, the range of uses has diversified and demand changes in line with London's changing economy. In planning terms, existing arches are often classed as 'industrial' (Use Class B2/B8), either due to recent occupation history, planning history records, or, for many long-term vacant arches with no/limited planning history because of presumed/expected historic occupation.
31. As an example, we own the arches in Hawley Wharf – a regenerated Camden town centre development comprising residential, education, retail, employment and leisure. There are protected light industrial and general industrial uses but these are no longer compatible with the new existing uses due to servicing and residential amenity. Given that railway arches have historically been classified as 'industrial', draft Policy IE3 (B) has the potential to restrict the range of opportunities which railway arches could deliver across the borough. Such restriction limits the ability for arches to contribute to the draft Local Plan's aim to deliver a strong, diverse, sustainable and inclusive economy. Flexibility is therefore required where there are new start-up businesses proposed, particularly where employment opportunities across a range of use classes are proposed.
32. Often 'industrial use' is afforded a blanket protected under planning policy, particularly where this falls outside of designated centres, and so securing permission for new uses which meet the evolving needs of modern-day occupiers is challenging. This often results in railway arches being maintained as 'industrial use' in planning use class terms, lying empty with anti-social behaviour consequences and contributing nothing to local economies or communities. Flexibility on a site-by-site basis is therefore required in the Local Plan under policy IE3.
33. Whilst parts 1-3 of part (B) do enable a route to be followed for the loss of industrial use, this route is onerous, time-consuming and could result in units lying vacant or being under-utilised. Whilst a railway arch may be able to accommodate a traditional industrial use, this does not necessarily mean that such a use is best suited for the space, or the local area.
34. This potential should be recognised by the draft Local Plan. In particular, Policy IE3 should be amended to specifically allow greater flexibility for a range of uses within railway arches. As drafted, it is considered that IE3 (B) is not positively prepared, as it has the potential to slow down and hinder economic growth and social benefits arising from railway arch occupation.

#### **Policy IE4 – Affordable workspace**

35. Whilst most arch development within the borough would not be classified as 'major' development, if a scheme is brought forward for a row of arches, it may be considered 'major' and therefore captured by Policy IE4, as currently drafted.

36. . Whilst the space within the railway arches is often 'lower-cost', it does not necessarily meet the policy definitions of 'affordable workspace' and subsequently affordable workspace policies can constrain bringing empty and derelict railway arches back into active use. This is counterproductive as railway arch spaces are rented at a relatively low rent compared to traditional purpose-built employment accommodation and any further reductions or restrictions on rents often makes lettings unviable.
37. Arches are fixed assets and the ability to bring forward new floorspace is very limited. Therefore, applying affordable workspace requirements to existing floorspace is considered unreasonable.
38. In order not to disincentivise railway arch development, we suggest that Policy IE4 be amended to specifically carve out railway arches from affordable workspace requirements and reference to the arches could be made in the supporting text. This would make the policy more positive, in line with para 36 of the NPPF, as it would enable the railway arches to better contribute to the draft Local Plan's aim to maintain and strengthen Camden's economic position.

#### **Policy IE9 – Delivery-led food businesses**

39. Railway arches can make good spaces for the operation of production kitchens, which serve as an ancillary support system for restaurants. These spaces are very different to 'dark kitchens', which typically provide food direct for delivery drivers to courier directly to customers and have high vehicle trip movements. Whilst there are vehicle movements associated with production kitchens, the trips generated are much less as such trips are consolidated and responding to co-ordinated demand from restaurants, rather than on a more piecemeal customer demand basis.
40. Policy IE9 deals with 'delivery-led food businesses' which are referred to in the policy as 'dark kitchens'. We request that a distinction be made, either in the policy or supporting text, around production kitchens, which operate quite differently from dark kitchens and do not generate the same levels of vehicle movements nor amenity issues.

### **Chapter 11 – The natural environment**

#### **Policy NE2 – Biodiversity**

41. Whilst The Arch Company supports the draft Local Plan's objective to enhance nature conservation and biodiversity in the borough, the scope of draft Policy NE2 should be re-considered to ensure it is proportionate.
42. In particular, part (A)(1) should be amended to refer to major 'new build' schemes. A 'major' railway arch scheme would have minimal opportunities for enhancing biodiversity owing to the constraints outlined above.
43. Part (A)(2) should be amended to refer to 'new build' development. At present, reference to 'development' would capture commercial changes of use. In order for the draft Local Plan to meet its economic objective, there needs to be flexibility and encouragement for a range of employment spaces to come forward.

#### **Policy NE3 – Tree planting and protection**

44. Part (8) should refer to 'new build' major development or major development where landscaping proposals are part of the wider application. As set out previously, the spatial constraints of arches mean that opportunities for landscaping proposals are very limited, and this should be recognised in supporting text.

### **Chapter 12 – Design and Heritage**

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

45. Another significant challenge faced by the Arch Company is planning requirements restricting critical operational requirements needed for businesses to operate successfully within the arches. This particularly relates to servicing and vehicular access.
46. The Arch Company is broadly supportive of initiatives for placemaking adjacent to the arches and creation of active frontage where appropriate ensuring a varied mix of uses is complementary to this aim. However, such proposals should not

compromise the continued operations of occupiers of the arches and not adversely affect the public highway / railway network. This is particularly the case for industrial/semi-industrial occupiers who need some vehicular access for their operations (deliveries etc.). Small brewers for example, need access to enable vans to deliver materials and transport their finished product, and this access needs to be to the door of the units. We therefore support the wording in Policy D1 part B. (6) and (7).

47. However, The Arc Co considers that Policy D1 part B (13) to place unreasonable restrictions on servicing. This part of the policy requires adequate servicing for each land use to be undertaken within the footprint of the building/s and site. The spatial limitations of arches mean that servicing needs to be primarily undertaken on street. The Arch Co consider that this part of the policy is not justified in accordance with the NPPF tests of soundness set out at paragraph 36 and should be deleted.

## **Chapter 13 – Protecting amenity**

### **Policy A3 – Air quality**

48. Part (A)(1) requires all development to submit an Air Quality Neutral Assessment. This is not reflective of the current GLA Air Quality Neutral London Plan Guidance (2023) which excludes some development at para 2.2.1. We suggest that the policy refer to GLA standards and guidance, to avoid a conflict.

## **Chapter 14 – Safe, healthy and sustainable transport**

### **Policy T2 – Prioritising walking, wheeling and cycling**

49. The Arch Company as a principle supports the development of sustainable transport modes. However, the creation of walking and cycling routes must not be at the expense of the commercial operations of the railway arches. Public realm proposals adjacent to arches need to strike an appropriate balance between placemaking and continued vehicular access to units when in commercial use, and highways regulation. Vehicular access will remain critically important to The Arch Company's small business occupiers. It is imperative that railway arches maintain vehicular and servicing access routes for operational purposes. These operational purposes should be acknowledged within the supporting text of Policy T2.
50. As noted above, the ability for railway arches to accommodate both short- and long-term cycle parking requirements is very limited. There should be recognition within Policy T2 Part (C) or the supporting text that the cycle parking requirements will be applied flexibly to railway arch development, acknowledging the inherent challenges in providing such facilities.

PED/SRO/U0028089  
27 June 2025

Date: Fri, 27 Jun 2025 14:10:32 +0100

From: Rachel Brennan

To: [redacted]

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

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I am writing in reference to **Site Allocation C27 - Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.**

While I am of the opinion that basic human rights for every individual includes the right to a safe place to live, and while I support the Council in its efforts to provide suitable sites for the Gypsy and Traveller Communities, 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).

## **PERSONAL DETAILS**

Name: Rachel Brennan

[REDACTED]

[REDACTED]

[REDACTED]

## **OUTLINE OF OBJECTION/REPRESENTATION**

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

## **REASONS**

### **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.

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## 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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#### 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 & REQUESTED ACTION**

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

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

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

Thank you in advance for taking the time to consider my request.

Yours faithfully,  
Rachel

Rachel Brennan



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

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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).

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#### Conclusion and Requested Action

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

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

Thank you for your consideration,

Amber Darr and Aisha Hassan Mumtaz

Date: Fri, 27 Jun 2025 13:59:15 +0100

From: Ben Olins

To: [redacted]

Subject: Objection to Proposed Traveller Site Allocation at Eton Court Road (Site C27) – Draft Local Plan Consultation

---

I'm writing in response to the Draft Camden Local Plan consultation to formally object to the proposed allocation of Site C27 (next to Constable House on Eton Court Road) for a Traveller and Gypsy site.

I fully understand that the Council is under a legal duty to identify potential sites, but I don't believe this particular location is suitable for several reasons:

**Location unsuitability**

This site sits very close to existing homes, and such a change would have a real and lasting impact on the character and amenity of the neighbourhood.

**Lack of infrastructure**

There are clear concerns around site access, parking, drainage, and the availability of essential services.

**Environmental and safety Issues**

We're already dealing with traffic congestion, pressure on green space, and localised antisocial behaviour issues. Adding further pressure here would not be sustainable.

**Limited local consultation**

Many residents, myself included, have only just become aware of this proposal and have had very limited time to respond.

**Further strain on local services**

Schools, GPs, and other local amenities are already stretched. This proposal would add to that strain.

I'm making this objection now because I'm aware that once a site is allocated in the Local Plan, it becomes much harder to oppose at later stages. I want to ensure my concerns are taken into account before any site allocation decisions are finalised.

Please confirm receipt of this email and ensure my objection is formally recorded as part of the consultation.

Also, I would ask that my full address and contact details are kept confidential and used only for internal validation purposes.

Yours sincerely

Ben Olins

[redacted]

[redacted postcode]

Date: Fri, 27 Jun 2025 13:16:54 +0000

From: Gary Lane

To: PlanningPolicy

Subject: Relocation of Regis Road Recycling Centre

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**Re: Regis Road Area Guidance March 2025**

I was shocked to see that this document was put out without any pretence at consultation after the solid and sensible consultation on the Kentish Town Planning Framework. I feel that suggestions/decisions made in that document are significant and in need of further, detailed consultation with the local community.

Of particular concern is the relocation of the Recycling Centre to a site that is closer to existing houses, shops, cafes, high street and schools (ie the existing police station parking lot) as shown on Page 47 of that document. This flies in the face of all logic except for the commercial logic of Yoo Capital who presumably wish the centre to be as far away as possible from the "new" properties that they are planning.

I support the retention of a recycling centre within the Regis Road area development. However, it does not make sense to move what can only be considered an industrial facility from a location in an industrial area to a predominantly residential area.

If Yoo Capital feel that it is of no concern being close to residential properties, then they should of course keep the recycling centre at or near its current location amongst the new properties that they are building. Of course, they don't want that, and so are proposing moving it to a site less detrimental to those new properties but to the detriment of existing residents of Camden whom the Council is there to serve. To move the site next to a residential road (Holmes Road) and right next to an approved new "hotel" and high street restaurants does not make sense. Better that it be moved to a location on the other side of the development, next to the railway tracks (maybe adjacent to the "Energy Centre" although there is precious little information as to exactly what that is too). Or perhaps in the mixed use neighbourhood such as, oh where it is now!

I therefore suggest that the planned move be scrapped altogether and that a fresh consultation opened with several alternative propositions made that can be considered by existing local residents.

Please acknowledge that these comments will be considered. Many thanks

--

Regards,

**Gary Lane**

[Redacted signature block]



Responder 541

Date: Fri, 27 Jun 2025 13:17:31 +0000  
From: Rod Evans  
To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
Subject: CLP Site C27

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## **Constable House – representations**

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

Please send your representations by email to [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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

### **PERSONAL DETAILS**

Name: Mr R O Evans BA (Hons) Solicitor MRTPI (Rtd)

[REDACTED]

[REDACTED]

[REDACTED]

### **OUTLINE OF OBJECTION/REPRESENTATION**

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

### **REASONS**

I am a former Planning Inspector (1991-2015). I make this representation on behalf of my daughter who lives at the above address. She has learning disabilities and is not competent to make any representations on her own behalf. I visit her often and lived in the area [REDACTED] for 30 years until 2018.

I have not been able to research the issue of need nor to inspect the site in the time available as I only became aware of the proposed allocation 24 hours ago. That in itself is a cause of complaint if not objection. Allocation in a LP is tantamount to a grant of outline permission as it is an acceptance of the principle of development – of which I have little doubt those proposing the allocation are well aware. It must be equally obvious to them that an application with proper notice to local residents would result in many representations so not to give wider notice I regard as cynical even if strictly within the rules.

With so little time available I can only adopt and support the reasons given below. They are clearly written by a person with knowledge and understanding of the site and of the planning issues involved. To which I would add that the allocation and later development of the site for traveller accommodation would be a surefire recipe for conflict between the occupiers and the surrounding settled community. That cannot be ignored – I saw it often as an Inspector but it is avoidable with appropriate site selection, even in a densely populated London Borough. And I say that having

granted a number of permissions myself for traveller sites in the past. It is not about prejudice it is just recognition of reality. Please, plant your feet firmly on the ground not in some imaginary ideal world.

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

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

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

**Conclusion**

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

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

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

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### 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.

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### 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.

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#### 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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#### 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).

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#### Conclusion and Requested Action

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

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

Please find below my contact details for any question you may have and further communication.

Thank you in advance for your consideration, Dr. Beatriz Penaloza Nyssen

Name: Dr. Beatriz Penaloza Nyssen



Date: Fri, 27 Jun 2025 13:24:27 +0000  
From: Planning  
To: PlanningPolicy, Barry Dawson  
Subject: FW: Proposed Travellers Site Adelaide Rd

---

I am writing to oppose this.

I have visited the Travellers site in Lynton Close, Neasden and base my reflections on this visit. The site is popular with travellers and currently overloaded.

1. Travellers are a robust people with their own custom and practices. When on an appropriate site they live in harmony with the residents. The Lyndon Close site is along side an industrial area. There are some adjoining houses but these look tired.

In front of the entrance to the site there are a number of rough service vans and flatbed trucks. Due to the industrial nature of the area, the travellers fit in peacefully.

2. There is an old saying of 'Like will always like to live with like'. London had diverse communities but they all migrate to their own areas. You do not normally have diverse communities living 'cheek to jowl'.

3. The proposed site is too small to make any difference to the need for new sites. I can visualise it being swamped, with running battles between the residents and the travellers. This is not good for the travellers. A worse case scenario is to having travellers hearing of a new site, coming to the area 'en masse' and finding nowhere to go, ending up on Primrose Hill.

4. There are areas in North London which have of heavy industry similar to Neasden. These might offer an area where the travellers could blend in without friction.

Yours sincerely,

Jonny Bucknell.

[redacted address],

[redacted]

[redacted postcode].

[redacted]

Date: Fri, 27 Jun 2025 13:24:36 +0000

From: Paul Heim

To: PlanningPolicy

Subject: Formal objection: Proposed relocation of Regis Road recycling centre to Holmes Road

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We fully oppose the relocation of the Regis Road recycling plant to be placed next to the police station in Holmes Road for the following reasons:-

Increased traffic, this recycling plant will be the only plant within miles so an enormous amount of traffic will be using it. There is a no entry sign by the police station, all vehicles will need to carry out u-turns. The pollution from these vehicles will cause dangerous levels of emissions and noise. I assume this plant will be open evenings and weekends, so no peace for anybody at any time! Holmes Road is controlled mornings & afternoons during school times and the traffic will be horrendous with all vehicles being diverted to the Kentish Town end of Holmes Road and then having to turn around as the rest of Holmes Road by St Patrick's school is a no entry.

Lorries, no doubt, a large amount of lorries will be using this entrance. Again, dangerous levels of emissions and noise.

Vermin, to include foxes, rats and seagulls.

St Patrick's school located across the road, no doubt children in the playgrounds will be subject to the smell & noise pollution. Why make Holmes Road and the area a "healthy school" zone only to place this plant right next to it?

There must be more suitable locations for the recycling plant or dispose of the recycling plant all together as there is a more suitable recycling centre at Hornsey.

There has also been a lack of public consultation.

This just haven't been thought out!

Regards,

[redacted]  
[redacted postcode]

Paul & Mandy Heim

[redacted address]

Responder 545

Date: Fri, 27 Jun 2025 13:25:55 +0000

From: Long Jumper

To: PlanningPolicy

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

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P Reddy

## 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="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Pr"/>	<input type="text"/>
Last Name	<input type="text" value="Reddy"/>	<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

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 type="text"/>	No	<input type="text" value="Unknown"/>

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

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

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

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

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

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

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

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

The Camden Local Plan Submission Draft is not legally compliant because there has not been inclusive consultation as required by paragraph 2.4 of the council's Statement of Community Involvement. In particular, the council has failed to give residents direct notice and make them aware of proposed Site Allocation C27. The council has not sent any letters or flyers to residents, it has not put up any site notices or public notices, and it has not held any events to inform residents of the proposals. Residents are either unaware of the proposals or only found out a few days before the deadline for submission of representations, giving them very little time to make representations.

The Camden Local Plan Submission Draft is unsound.

It is not positively prepared and does not comply with Policy H11. In particular:

- the site is very awkwardly located, and it would be very difficult to provide safe access to and from the main road network
- the site has a history of severe flooding, and in the open is very noisy and polluted given that it is in a high traffic zone and close to a railway line. It is also surrounded by large residential housing blocks, and new developments currently being built, all of which overlook it. It would not support the health and wellbeing of occupiers.
- the site is very small and would not be able to accommodate even a small number of pitches, families and facilities on it
- it will be very difficult to integrate the site with the local community because of the strength of local opposition to it
- the site, as shown in the Camden Local Plan Submission Draft, would eradicate existing green space, which includes community fruit trees and a wildflower meadow, and this in turn would have a negative effect on the local community and also attempts to improve local biodiversity
- families and other residents currently use the site as a playground and sports area. Losing this would again have a negative impact on the community.

It is not justified, and no evidence or analysis has been provided as to why this site is considered suitable or appropriate rather than other sites.

It is not effective. The site's size and location make it difficult to develop and there is strong local resistance.

(Continue on a separate sheet if necessary)

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

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



Please remove Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site) from the Camden Local Draft Submission Plan. Site Allocation C27 is not legally compliant and is unsound for the reasons given at 5 and 6 above, and should therefore be removed in order to avoid rendering the Camden Local Draft Submission Plan not legally compliant and unsound.

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

**Privacy Notice**

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

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

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

11. Signature:	<i>P Reddy</i>	Date:	27 <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.

Date: Fri, 27 Jun 2025 13:27:41 +0000  
From: Dominic Charles  
To: PlanningPolicy  
Subject: Planning consultation response

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

**Knowles Construction Limited** | Company no. 07398848 Registered in England & Wales Group VAT no. 334 5063  
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**IMPORTANT** | Confidentiality: This email and its contents are intended for the above name only and may be confidential. If this has come to you in error, please take no action, nor copy, nor share with anyone. Please reply to the sender and highlight the error.

**Cybercrime Warning** Knowles will NEVER notify you of a change of bank details by e mail. If you receive any communication regarding this, please call 020 3988 7994 and speak to Accounts. Likewise, we are unable to accept notification of changes to your bank details by e mail.

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)
<i>*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.</i>	
<div>mr</div>	
<div>dominic</div>	
<div>charles</div>	
<div></div>	
	(where relevant)
	(where relevant)



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

Name or Organisation: Knowles Construction Ltd

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

Documents can be found at the following links:

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

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

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

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

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

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

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

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

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

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

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

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

I would like to add that our company employs about 300 people who work in the sector with annual turnover of £80m.

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.

I would also point out that these basements often include staff accommodation so that to prevent basement expansion would on average dehouse 2 people and force them to commute from the outer suburbs each day.

(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.

Responder 547

Date: Fri, 27 Jun 2025 13:28:39 +0000

From: [redacted]

To: PlanningPolicy

Subject: Relocation of Recycling Centre in Kentish Town

---

[redacted] redacted address]. [redacted postcode]

[redacted]

I object to this relocation to a residential area with nearby schools and police station. Also it will devalue the local property and prohibit mortgage loans. It is appalling that we have not been advised of this until near the closing date.  
Mary Hill



Responder 548

Date: Fri, 27 Jun 2025 13:29:05 +0000  
From: CLAIRE SANDRET  
To: PlanningPolicy  
Subject: Objection to recycling

---

[You don't often get email from [redacted] 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.

Hi,

I'm Claire, I live at [redacted address] NW5 and I object the recycling facility proposal in Kentish Town.

Thanks  
Claire

Sent from my iPhone

Responder 549

Date: Fri, 27 Jun 2025 13:29:58 +0000

From: Brian Stack

To: PlanningPolicy

Subject: Camden basement planning policy consultation.

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Brian"/>	<input type="text"/>
Last Name	<input type="text" value="Stack"/>	<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: Sherlock London Ltd

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

Documents can be found at the following links:

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

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

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	<del>Yes</del>	<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 proposed modifications given in the ASUC representation regarding Policy D6 Basements

I would like to add that our company employs 150 people who work in the sector with annual turnover of £[INSERT COMPANY ANNUAL TURNOVER].

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

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:	27 <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.
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other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

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

- ***Effective***

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

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Date: Fri, 27 Jun 2025 13:35:43 +0000

From: Alexa Segal

To: PlanningPolicy

Subject: Objection

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I live at [redacted address], [redacted] [redacted postcode] and am writing to object to the proposal to move the Regis Road Recycling Facility from its current location to a location on Holmes Road.

Moving a commercial recycling area into a residential area is completely inappropriate. It will have an effect on the nature of the area, the level of traffic, the air quality and the value of residential properties in the area.

Further, the idea that this is being done as part of a private and commercial development which will allow a developer to put private residential properties in the recycling's current location and then sell those at a high price, whilst negatively impacting all the people who live in the area is morally wrong.

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

Kind regards

Alexa Segal

Alexa Segal  
[redacted signature block]

Date: Fri, 27 Jun 2025 13:35:37 +0000  
From: MARTINE SMILES  
To: PlanningPolicy  
Subject: Planned Regis Road Recycling Centre

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I am writing to formally object to the proposed relocation of the Regis Road Recycling Centre to Holmes Road, as outlined in the Regis Road Area Guidance (March 2025). I object for the following reasons:

Unsuitable Location

Holmes Road is a quiet residential street adjacent to a conservation area and St Patrick's primary school. The introduction of an industrial facility here would significantly degrade the area's character and residential quality.

Noise and Nuisance

The proposed facility would generate unacceptable noise from skip deliveries, waste compaction, and increased vehicle movement disrupting the peace of a primarily residential area.

Facility Redundancy:

The Hornsey Street facility is superior:

- Longer opening hours and more capacity (volume of waste and visitor numbers)
- Reduced queuing and unloading risks
- Underground location with air filtration
- Acceptance of a wider range of waste (e.g. paint, asbestos)
- Higher vehicle clearance (1.85m vs 1.75m)

Its proximity makes relocating the Kentish Town site unnecessary and it would therefore be preferable to both local residents and the developers, Yoo Capital, for the facility to be decommissioned and not replaced.

Lack of Public Consultation:

Engagement with residents (those most affected) on this proposal has been woefully inadequate. This warrants further scrutiny and transparency.

Motivation Behind Relocation:

This relocation appears to serve the interests of new residential developments planned for the current Regis Road site. Acknowledging that the presence of a recycling centre would diminish the value of those new properties, it is being effectively "dumped" on the edge of the site at the expense of the existing residential community on Holmes Road and surrounding streets. This is an unfair and short sighted planning compromise that prioritises developer profits over the wellbeing of current residents and the students at St Patrick's primary school.

I urge Camden Council to reject the proposed Holmes Road relocation and instead pursue alternatives more consistent with residential and environmental priorities.

Sincerely,

Martine Smiles

[redacted address] [redacted postcode]

Date: Fri, 27 Jun 2025 13:42:47 +0000

From: Phillip Barr

To: PlanningPolicy

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

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To: Camden Council Planning Policy Team

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

PERSONAL DETAILS

[REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

I'm writing to register my profound objection to the proposed allocation of Site 27 Land East of Constable House, [redacted postcode] for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

I fully appreciate the rights of Gypsy, Roma and Traveller communities to access suitable accommodation, however it is clear that this particular proposal is inappropriate, and critically unsuitable, for a multitude of planning based reasons, such as those I've detailed below.

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. Better Alternatives Exist

First and foremost, 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 (as detailed further below).

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).

2. Lack of Consultation

I am deeply troubled by the lack of consultation surrounding this proposal, and the appearance that the proposal itself has been engineered to attempt to 'slip under the radar of local residents. Many of those who I've spoken to (since becoming aware myself) and who will be directly impacted by the proposal were unaware of the proposal. I myself only found out about it via a local Facebook group a week before the objection deadline. I'd point out how many people do not use facebook, and even less are part of the specific facebook group that raised awareness.

This has seriously eroded my trust in the council and in the planning process.

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### 3. Loss of a 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 area. 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.

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### 4. 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.

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

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

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

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

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### 6. 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. It begs the question as to whether the proposal could even be effectively delivered without opening the council to further policy breaches as highlighted below:

This constraint breaches key policy requirements:

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

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### 7. 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.

#### 8. 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.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site. The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to:

- (i) provide new and/or improved sport and leisure facilities for young people;
- (ii) deliver new and enhanced areas of open space and play space, and improved access to nature;
- (iii) enhance greening and biodiversity, and;
- (iv) deliver flood mitigation measures and sustainable drainage systems.

#### Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to:

- The loss of essential amenity space;
- Inherent flood, privacy, and access constraints;
- A flawed and opaque site selection process.

I therefore request that:

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

Responder 553

Date: Fri, 27 Jun 2025 13:43:43 +0000

From: Carmel Lewin

To: PlanningPolicy

Subject: Representation form for the local plan 2025

---

For the avoidance of doubt, and in case the form is not completed correctly for any reason I would like to object to the proposal to locate a traveller site next to chalk farm underground station.

yours sincerely

Carmel Lewin

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

Name or Organisation: CARMEL LEWIN

**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 C27p.4.13 Policy GYPSEY+TRAVELLER SITE AT CHALK FARM 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 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 checked="" type="checkbox"/> |
| (2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)  | <input checked="" type="checkbox"/> |
| (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)               | <input type="checkbox"/>            |
| (4) Consistent with national policy                                                                                                                   | <input type="checkbox"/>            |

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

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

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

I DO NOT THINK THIS POLICY IS SOUND BECAUSE

1. THE SITE IS TOO SMALL - SMALLER THAN MIN. STANDARD
2. IT IS OVERLOOKED BY FAR TOO MANY PROPERTIES
3. DENSITY - THE AREA IS ALREADY DENSELY POPULATED
4. LOSS OF GREEN SPACE + MATURE TREES
5. LARGE VEHICLE ACCESS + EGRESS NOT POSSIBLE ON ETON COLLEGE RD, AND DANGEROUS ON ADELAIDE RD.
6. LACK OF AMENITY SPACE FOR THE PITCHES

7. LIKELIHOOD OF PROBLEMS SUCH AS NOISE FOR ADJOINING PROPERTIES.
8. IF THIS SITE IS DEEMED SUITABLE FOR TRAVELLER, THEN PROPER HOUSING SHOULD BE BUILT HERE, OF SEVERAL STOREYS TO ACCOMMODATE THOSE ON THE CAMDEN HOUSING WAITING LIST. INSTEAD. ~2 CARAVAN PITCHES IS A WASTE OF SPACE.

(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.

A MORE SUITABLE SITE SHOULD BE FOUND ELSEWHERE IN THE BOROUGH.

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

#### Privacy Notice

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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:	27 June 25
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Date: Fri, 27 Jun 2025 13:44:56 +0000 From: James Burns  
To: policy@camden.gov.uk, PlanningPolicy Subject: Site Allocation C27

Dear Camden Council,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Yours faithfully,  
  
James Burns



Date: Fri, 27 Jun 2025 13:45:56 +0000  
From: Matthew Wrigley  
To: PlanningPolicy  
Subject: Gypsy and Traveller Site - Site Allocation C27

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

Hello

I write in support of the proposals.

Yours faithfully,

Matthew Wrigley  
[redacted address]  
[redacted] [redacted postcode]

Date: Fri, 27 Jun 2025 13:46:32 +0000

From: Teri

To: PlanningPolicy

Subject: Objection to Proposed Traveller Site Allocation: Constable House, Eton College Rd – Draft Local Plan Consultation

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Dear Planning Team,

I am writing to object to the proposed allocation of land adjacent to Constable House, Eton College Road, as a Gypsy and Travellers site under the emerging Local Plan.

While I recognise the Council's obligation to provide suitable sites, I do not believe this location is appropriate for the following reasons:

1. **Site Size and Suitability**

The proposed site is extremely small and irregularly shaped. It is unclear whether it can provide adequate space for a Traveller community to live safely and comfortably, with sufficient room for essential facilities, vehicle movement and privacy.

2. **Proximity to Dense Residential Housing**

The site is directly next to Constable House and opposite the three large Eton apartment buildings. Hundreds of additional flats are also under construction nearby, which will further increase pressure on local services and infrastructure, including schools, healthcare and utilities.

3. **Impact on Local Amenity and Environment**

Using this site risks significant noise, light and privacy impacts on surrounding residents, with little opportunity for meaningful screening due to the site's small size and dense surroundings.

4. **Access and Safety Concerns**

Adelaide Road and Eton College Road already experience heavy traffic, including buses and delivery vehicles, with narrow pavements in parts. Additional vehicle movements, particularly from larger caravans, would worsen congestion and pose safety risks for pedestrians and cyclists.

5. **Impact on Air Quality and Loss of Green Space**

The Council has committed to reducing pollution across the borough. Replacing even this small area of green space with hardstanding would contribute to air pollution in an already congested area, contradicting climate and environmental goals while removing limited local green space.

Given the site's limitations, dense surroundings, and the strain on local infrastructure, I do not believe it is appropriate for allocation as a Gypsy and Travellers site.

I am submitting this objection now because I understand that once a site is allocated in the Local Plan, it becomes much harder to oppose later. I would therefore like my concerns to be considered before any decisions are finalised.

Please confirm receipt of this email and ensure my objection is formally recorded as part of the consultation. I also request that my address and contact details are kept confidential and used only for validation purposes.

Yours sincerely,  
Teri Olins

Date: Fri, 27 Jun 2025 13:51:43 +0000

From: Danny Weil

To: PlanningPolicy

Subject: Draft Plan Site Allocation Objection – Site C27 Land Adjacent To Constable House

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Dear Camden Planning Department

We write on behalf of Shellpoint Trustees Limited with the interest in the site being the freeholders of the Etons, ie. Eton Hall, Eton Rise and Eton Place, all located on Eton College Road immediately adjacent to Site C27.

We write to object to this part of the Plan and seek for it to be deleted from the Camden Plan.

The reasoning behind this includes loss of public amenity and open space as the land forms part of the open green space associated with Constable House and the surrounding area. This particular piece is often used by locals in an otherwise highly dense urban area. In addition it would create a loss of green space including land that is part of the Coummuni-Trees project which itself is an initiative involving Camden Council as well as the Koko Foundation and Think And Do. This entire initiative would be lost under the proposal in contradiction with Camden's own biodiversity and green infrastructure plans.

Furthermore the area forms a playground and provides some provision for youth in the area with all of this being used and no alternative being available anywhere near this piece of land.

The site is overlooked by Constable House as well as properties on Provost Road and the Etons, the last of which are much higher than the four storey limit that is set for the threshold for overlooking a residential area.

Furthermore there is a flood risk as the site itself lies in a flood risk zone and only recently experienced severe flooding across the play area. The government's own planning policy for traveller sites states "Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should therefore ensure that their policies; (g) do not locate sites in areas in high risk of flooding ..." There is a lack of access to the area with access almost certainly passing through Constable House's estate which itself is felt to be disruptive and unsafe. In addition there is no evidence that an infrastructure has been considered including availability of school places, doctors services and public facilities.

Camden's Draft Plan states that there should be improved sport and leisure facilities for young people, delivering new and enhanced areas of open/play space and access to nature, enhancing greenery and supporting flood mitigation. This entire proposal is against all of these plans.

Having been made aware of a residents meeting that took place at the Etons where residents of Constable House were also present, we understand that there was no meaningful consultation whatsoever with the residents in Constable House only becoming aware a few days before the deadline for submissions. This is in breach of Camden's own rules regarding consultation.

We request that the Camden Draft Plan be modified by removal of Site C27 as a proposed traveller site for the reasons outlined above. We do wish to participate in the examination in public and as freeholders we are directly affected by the proposal and wish to be heard in relation to this flawed site allocation.

Yours sincerely

On behalf of Shellpoint Trustees Danny Weil  
Director, Parkgate-Aspen

Date: Fri, 27 Jun 2025 13:54:23 +0000  
From: Craig Slack  
To: PlanningPolicy  
Subject: Dominus representations to Camden Local Plan: Proposed Submission  
Draft April 2025

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|

Planning Associate

[redacted]

[redacted] [redacted] [redacted postcode]

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

27 June 2025

**Camden Local Plan: Proposed Submission Draft April 2025**

To whom it may concern,

We, Dominus, write to the London Borough of Camden ('the Council') to submit representations to the **Camden Local Plan: Proposed Submission Draft April 2025** (hereafter referred to as the 'new Local Plan'), which is out for consultation until 27 June 2025, and pursuant to Regulation 19 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012.

The Council's planning officers will be aware that we are the leasehold owner of the building at 123 Judd Street; and that we are in the process of engaging with the local community and are undergoing a pre-application process with Camden's officers about the rejuvenation of the existing telephone exchange to provide a vibrant mixed-use scheme for a hotel and with the continued use of the telephone exchange.

Our comments about the new Local Plan are made in Table 1 below.

**Table 1: Comments about new Local Plan policies**

	Comment
Policy S1: South Camden	<p>We support the provision of Policy S1 for '<i>...maximising community benefit at the planning, construction and end-user phases, including supporting increased access to jobs, skills training and educational opportunities.</i>'</p> <p>Indeed, our proposed hotel-led development at 123 Judd Street would create new job opportunities for local residents by:</p> <ul style="list-style-type: none"> <li>• Employing over 100 people on site and from within the local community wherever possible</li> <li>• Delivering new training and apprenticeships programmes, targeted towards the local community, that create routes into employment at 123 Judd Street</li> </ul>

**Policy H2: Maximising the supply of self-contained housing from mixed use schemes**

- Exploring wider initiatives to help strengthen the local economy through procurement and partnerships

Policy H2 seeks to promote the inclusion of permanent self-contained homes as part of a mix of uses, where non-residential development over 200 sqm is proposed in specified areas, including within South Camden.

Part C of the policy gives criteria for assessing whether an off-site contribution could be made instead of on-site delivery of residential floorspace; which includes *'whether an alternative approach could better meet the objectives of this policy and the Local Plan.'*

We agree with the flexibility that Part C of the policy contains. Not all sites can deliver housing on-site for various reasons; and in such instances, officers should be empowered to make a balanced judgement about whether a financial contribution to affordable housing, in lieu of housing delivery on-site, will better meet Council objectives.

We are aware that other interested parties are objecting to Policy H2 on the basis that they consider it to be unjustified and inappropriate, because requiring housing on site can prevent otherwise beneficial development being brought forward, and because they believe it is in conflict with the London Plan.

**Policy IE1: Growing a successful and inclusive economy**

We support the overarching objective of Policy IE1, which is to *'...secure a strong, diverse, sustainable and inclusive economy in Camden, and maximise opportunities for the borough's residents, businesses and voluntary sector to contribute to and share in the success of Camden's economy...'*

We support Policy IE 1 in terms of it supporting *'businesses and enterprises of all types and sizes for a variety of business activities.'* This will recognise the importance of other employment generating uses, such as hotels.

As with Policy S1, we support Policy IE1 in terms of how it seeks to *'support residents seeking work to access jobs, skills, education and training opportunities; and local business start-ups, by maximising benefits from employment developments throughout the life of the scheme, (planning, construction, fit out and occupation).'*

**Policy IE5 – Hotels and visitor accommodation**

We agree strongly with Policy IE5 and its overarching objective:



*'The Council recognises the importance of the visitor economy in Camden and will therefore protect existing hotels and visitor accommodation and support proposals for additional hotels and visitor accommodation, where these are appropriately sited, and the impact of the proposal on local residents and the surrounding area are appropriately mitigated.'*

Overall, the parts of the new Local Plan that we have expressed support for above are considered to be sound in terms of meeting the tests of paragraph 36 of the National Planning Policy Framework (NPPF) (2024) and being legally compliant with the London Plan (2021).

Should you require any information or further discussion, please do not hesitate to contact us.

[Redacted signature block]

[Redacted signature block]

[Redacted signature block]

[Redacted signature block]

[Redacted signature block]

Date: Fri, 27 Jun 2025 13:57:27 +0000  
From: Gabriella Bexson  
To: PlanningPolicy  
Subject: Camden Local Plan Representations - Create Reit

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[REDACTED]

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Email: [redacted]

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EC3A 8BE  
Tel: +44 (0) 20 7493 4002

27 June 2025

Planning Policy  
London Borough of Camden  
2<sup>nd</sup> Floor, 5 Pancras Square  
c/o Town Hall, Judd Street  
London WC1H 9JE

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

Dear Sir / Madam

**DRAFT NEW CAMDEN LOCAL PLAN (REGULATION 19 CONSULTATION VERSION)  
REPRESENTATIONS ON BEHALF OF CREATE REIT**

We write on behalf of our Client, Create Reit, to formally submit representations to the London Borough of Camden ('LBC') consultation on the Regulation 19 Proposed Submission Draft of the New Local Plan.

**Create Reit**

Create Reit ("CR") is a key stakeholder in LBC, owning / controlling several important sites in the Kentish Town / Regis Road area of Camden including Howdens, Unit B, Regis Rd, London NW5 3EW, 6-8 Holmes Road, 295-315 Kentish Town Road and 341-347 Kentish Town Road, NW5 3TJ. CR are also exploring opportunities to acquire other land parcels within the Regis Road Growth Area. These representations relate to the Howden's site.

CR welcome the opportunity to comment on the Regulation 19 Proposed Submission Draft of the New Local Plan, as a key stakeholder within the Borough. We welcome the positive tone of the draft document, and the emphasis placed on supporting the creation of healthy and sustainable places in Camden, and in particular, in the Kentish Town area.

**Priorities & Objectives**

CR wish to work with LBC and other key stakeholders to deliver a new centre for Kentish Town, providing much needed new homes and jobs, whilst also creating and fostering a safe, accessible, healthy and vibrant neighbourhood.

CR is supportive of the key aims of the Draft New Camden Local Plan and share the following strategic objectives of LBC, as set out in the Draft New Camden Local Plan:

- Ensuring that development in LBC responds to the climate emergency;
- Increasing the supply of homes within the Borough, with an emphasis on genuinely affordable homes;
- Ensuring development meets the needs of LBC's diverse communities'
- Strengthening LBC's nationally important economy;
- Ensuring town and neighbourhood centre are accessible and sustainable;
- Supporting high quality, sustainable and inclusive design;
- Promoting active and sustainable travel;

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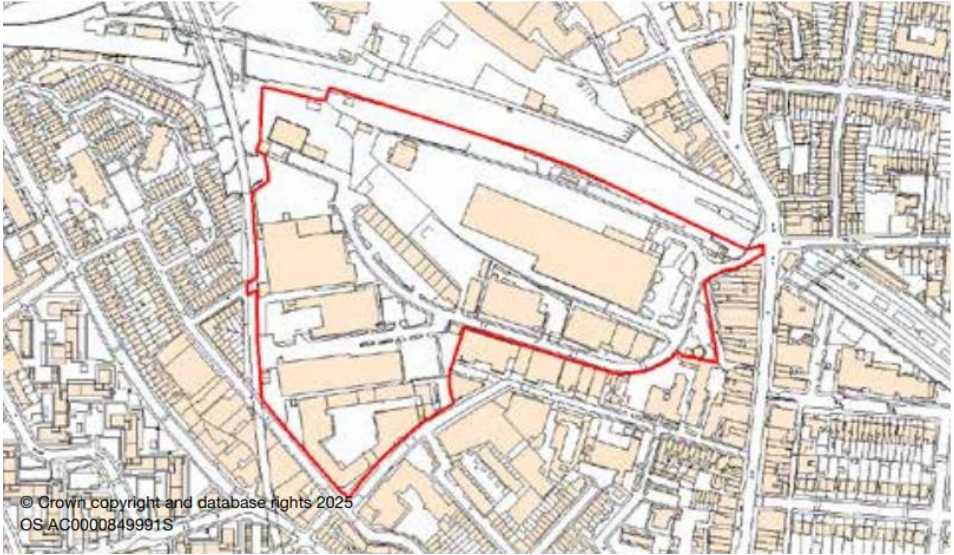
- Improving access to parks, green spaces and biodiversity; and
- Promoting health and well-being.

### Draft Policies upon which Representations are Submitted

These representations focus on the Site Allocation for the Regis Road and Holmes Road Depot Site which the Howden's site owned by CR falls within.

### Draft Site Allocation C2 Regis Road and Holmes Road Depot

Please find the relevant policy extract, followed by our representation (in red) below:

<b>Site Plan</b>	
<b>Address</b>	Regis Road, Holmes Road Depot
<b>Area</b>	9 ha
<b>Allocated Uses</b>	Industry / employment (including offices), permanent self-contained homes, community uses; open space; waste and recycling facilities; and depot facilities.
<b>Allocated Uses Representation</b>	<p>CR is supportive of the allocated uses set out within the draft site allocation. It is noted that the Regis Road Area Guidance considers other uses may be appropriate in this location, to enable the coexistence of large commercial uses, including creative uses such as the Camden Film Quarter, light industrial, and last mile delivery centres, with new homes, neighbouring residents and visitors, and a new public park.</p> <p>It is also considered that, hotel uses would be appropriate in this location, given the proximity to the high street, and the new residential and commercial uses expected to come forward within the Regis Road site. It is important that a wide range of uses are allowed for in this location, to support the varied needs of new and existing local businesses and residents.</p> <p>In addition, it is important that other residential types are encouraged, alongside self-contained homes, in this location. This is important to ensure the Site contributes towards an element of housing choice, meeting the needs of different people within Camden, in line with Camden and GLA policies.</p>

<b>Indicative Capacity</b>	1,000 additional self-contained homes
<b>Description of Existing Site</b>	<p>The Regis Road site is currently occupied by industrial premises, which house logistics, manufacturing and other businesses. It also includes the Council's Recycling and Reuse Centre and car pound. Many buildings on the site are single storey sheds surrounded by areas of yard space and parking. The Holmes Road Depot site contains a Council depot and offices, and 25 homes (including 20 affordable homes).</p> <p>The site is bordered to the north and west by railway lines, to the south by the rear of properties on Holmes Road, and to the east by York Mews, which lies behind Kentish Town Road. Currently the junction with Kentish Town Road is the only way in and out of Regis Road, which is largely cut off from surrounding areas.</p>
<b>Context</b>	<ul style="list-style-type: none"> <li>Proposals should be progressed through a comprehensive masterplanning process, informed by the Kentish Town Planning Framework and the Regis Road Area Guidance, which has been prepared by the Council as an addendum to the Planning Framework.</li> <li>The Kentish Town Neighbourhood Plan identifies Regis Road as a potential area for mixed-use development. It sets out a number of criteria to guide development within the Regis Road site. The Plan notes that the site is currently underused and states that the intensification of the site through mixed-use development, including housing, industry, offices, start-ups, and other uses, is supported by the local community subject to consideration against relevant policies.</li> <li>The Neighbourhood Plan also includes a policy on the future development of the Holmes Road depot site.</li> <li>The Council is progressing a regeneration strategy involving using Camden's land assets on Regis Road and Holmes Road as an enabler and catalyst for the regeneration that will bring forward the benefits envisaged in the Planning Framework and Neighbourhood Plan. The strategy's objectives include enabling re-provision of the Recycling Centre and other Council service provision as necessary, ensuring continuous operation</li> </ul>
<b>Development and Design Principles</b>	<p>Development must:</p> <ol style="list-style-type: none"> <li>be designed to create a vibrant and sustainable new mixed-use neighbourhood that is integrated into the surrounding area through excellent design and architecture, providing significant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses, to create a socially diverse place that builds on the distinctive community and character of Kentish Town;</li> <li>ensure that a comprehensive approach is taken to site design and layout, having regard to the Kentish Town Planning Framework and Kentish Town Neighbourhood Plan;</li> <li>intensify industrial and other employment uses through efficient design that enables co-location with housing and other proposed uses;</li> <li>ensure that non-employment uses do not compromise the operation of employment uses;</li> <li>provide a range of employment uses, including industrial and storage, warehouse and logistics uses, and affordable workspace, to increase the range of business premises and sectors on site, and provide significant additional jobs;</li> <li>seek to contribute to the continued success of existing business clusters, including light industry and the creative and knowledge sectors, and maintain the area's role providing for businesses supporting London's Central Activities Zone;</li> </ol>

	<ol style="list-style-type: none"> <li>7. seek to retain existing businesses that wish to stay on the site, where possible, and in particular uses that support the functioning of the CAZ or local economy. The developer should work with existing businesses to understand their requirements, ambitions and the potential for reprovion or relocation. A business retention / relocation strategy must be provided as part of the planning application for the site;</li> <li>8. that any provision of retail, food and drink uses is of an appropriate scale and is designed to complement, and not compete with or cause harm to, the vitality and viability of existing centres, in particular Kentish Town and Queen's Crescent. Smaller scale provision will be supported where it is intended to serve the needs of those living in, working in, or visiting the site, and where it is designed and located to activate key public spaces;</li> <li>9. reprovide on site the existing housing floorspace (including the affordable housing) from the Holmes Road Depot site, in addition to the required new housing provision across the wider scheme area;</li> <li>10. make provision for the particular housing needs identified in Policy H6 where appropriate, and consider the inclusion of affordable housing for older people, or other people with care or support requirements, as a proportion of the overall additional affordable housing provision;</li> <li>11. significantly improve connections both through the site, and between the site and the surrounding area, to promote active travel and ensure that the site is successfully integrated into the wider Kentish Town area;</li> <li>12. ensure that the design and layout of the site gives priority to the movement of pedestrians, people using wheelchairs, cyclists and public transport over the operational, servicing and parking demands of private vehicles and that vehicle movements and parking provision are minimised. Where new and/or improved routes are provided, these should be designed to be inclusive, accessible, welcoming, safe, green, well-lit and overlooked;</li> <li>13. provide a variety of high quality green and open spaces and new green infrastructure, including new civic spaces, active spaces for play, landscaped green amenity spaces and natural to semi-natural space for nature conservation. These should be designed and managed in accordance with Policy SC4 (Open Space);</li> <li>14. provide a new public square as a focus for the area and community activity;</li> <li>15. contribute towards the provision of new community facilities and/or the improvement of existing facilities to meet increased resident needs in accordance with Policy SC3 (Social and Community Infrastructure);</li> <li>16. include the provision of free, publicly accessible toilets suitable for a range of users, including changing places toilets, and free drinking water;</li> <li>17. create new and enhance existing areas of biodiversity across the site;</li> <li>18. enhance biodiversity corridors along the railway lines to the north and northwest of the site, (which are a designated Grade I Site of Important Nature Conservation) in order to support biodiversity and create and improve connections for wildlife to support the delivery of the Camden Nature Corridor;</li> </ol>
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	<p>19. ensure that conflict between servicing traffic and public areas is minimised, with separation as far as possible;</p> <p>20. be designed to be compatible with, and facilitate, the development of neighbouring sites, in particular the Murphy site;</p> <p>21. explore the provision of temporary (meanwhile) uses on the site to maintain activity as a comprehensive scheme is progressed. The Council will expect a meanwhile use strategy for this site to be submitted as part of plans for comprehensive development, in line with considerations set out in the Kentish Town Planning Framework; and</p> <p>22. be taken forward in a coordinated way, working jointly with other landowners and neighbouring sites. A phasing plan will be required at the planning application stage to demonstrate how the delivery of the site will be taken forward. The Council will resist schemes that prejudice future development and design quality across the whole site and wider area; and where the timing of delivery would be unsupported by infrastructure.</p> <p>The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 52 m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.</p>
<b>Development and Design Principles Representation</b>	<p>CR is supportive of the development and design led principles set out within the draft Site Allocation.</p> <p>CR is supportive of the ambition to reprovide housing and deliver new housing in line with the draft site allocation, as set out in parts 9 and 10. In terms of meeting housing need, it is important that other residential types are encouraged, alongside self-contained homes, in this location. This is important to ensure the Site contributes towards an element of housing choice, meeting the needs of different people within Camden, in line with Camden and GLA policies.</p> <p>CR is supportive of the ambition to improve connections to, and within the site, providing safe and attractive pedestrian and cycle routes. In addition, CR is supportive of the ambitions for biodiversity enhancements across the site.</p> <p>CR welcomes the conclusion of the Camden Building Height Study and agrees with the identification of this site as a location where tall buildings may be an appropriate form of development. It is agreed that additional height above the proposed range is likely to be possible in some locations on this site, however this will be determined by appropriate testing of local and strategic views.</p>
<b>Infrastructure Requirements</b>	<p>Development must:</p> <p>23. retain or reprovide the Regis Road Recycling Centre and other Council service provision, as necessary, unless suitable compensatory sites are provided elsewhere that replace the existing service provision. The continuous availability of services must be maintained in all circumstances. Re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site;</p> <p>24. ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles on to a separate service road in advance of any significant commercial</p>

	<p>development. This should be included as part of the Phasing Plan required for the development;</p> <p>25. provide a new safe and attractive pedestrian and cycle route between Regis Road and Kentish Town Road via York Mews; and the wider area;</p> <p>26. provide a new pedestrian and cycle route between Regis Road and Arctic Street;</p> <p>27. provide a new connection between Regis Road and Holmes Road;</p> <p>28. provide a new connection to Spring Place next to the Holmes Road Depot. This should be designed to ensure that it supports both pedestrian and cyclist movement, and local servicing in a controlled manner;</p> <p>29. provide a new north-south pedestrian and cycle route along 'Makers Lane' (the new route proposed between employment premises on Highgate Road and Kentish Town West) to connect Kentish Town West with the Murphy site and the wider area;</p> <p>30. significantly improve the junction of Regis Road and Kentish Town Road to create a safe, welcoming and legible entrance to the new neighbourhood that prioritises the movement of pedestrians and cyclists and provide servicing access for the new employment uses;</p> <p>31. provide, or facilitate and contribute towards, a new pedestrian and cycle bridge across the railway line to connect the Regis Road and Murphy sites, to provide a connection to the Heath Line, Hampstead Heath and the wider area;</p> <p>32. contribute towards improvements at Kentish Town Thameslink and Underground station (including the provision of step-free access, a new station entrance and an enhanced town square) and Gospel Oak station (including a new eastern access and improved public realm); and</p> <p>33. contribute towards the delivery of the Camden Nature Corridor.</p>
<b>Infrastructure Requirements Representation</b>	<p>Overall, the contributions towards infrastructure including public transport, pedestrian and cycling links, are supported, providing that they are subject to assessment of feasibility, viability and demand.</p>
<b>Other Considerations</b>	<ul style="list-style-type: none"> <li>• Part of the site is within a viewing corridor identified in the London View Management Framework SPG.</li> <li>• Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).</li> <li>• The site is within an area identified by the Council as being at risk of flooding. A Flood Risk Assessment will therefore be required in accordance with Policy CC10 (Flood Risk). Recommendations in the Flood Risk Assessment will be secured by planning condition.</li> <li>• Part of this site is within a Tier II Archaeological Priority Area and therefore archaeological investigations should be undertaken to establish the extent of any surviving remains of interest and record as appropriate.</li> <li>• Applicants will be expected to liaise with Thames Water early in the design process to investigate whether the existing water supply and wastewater network capacity in this area is able to support the demand anticipated from the development or whether local upgrades and / or a detailed drainage strategy may be required.</li> </ul>

#### Future Involvement in the Local Plan Process



Create Reit takes a keen interest in development planning and welcomes the opportunity to provide formal representations to LBC on the Draft New Camden Local Plan.

We would be grateful if you could keep us informed of progress on the emerging Local Plan, including future consultations. Please contact Gareth Fox on 07894 815 343 or at [redacted text] of these offices.

Yours faithfully,

*Montagu Evans*

Montagu Evans LLP