

Date: Fri, 27 Jun 2025 13:59:47 +0000

From: Joel Oorbitg

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="Joel"/>	<input type="text"/>
Last Name	<input type="text" value="Orobitg"/>	<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: HELIUM ENGINEERING LTD

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

Documents can be found at the following links:

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

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

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

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

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

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

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

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

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

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

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



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

I would like to add that our company employs two people who work in the sector with annual turnover of £200,000

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

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

(Continue on a separate sheet if necessary)

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

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

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

(Continue on a separate sheet if necessary)

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

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

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

☐ No

No

☐

Yes

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

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



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


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

**Privacy Notice**

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

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

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

11. Signature:		Date:	26 <sup>th</sup> June 2025
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

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

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

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

## 3. Soundness

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

### • **Positively prepared**

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



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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

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

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

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



Date: Fri, 27 Jun 2025 14:03:42 +0000  
From: CE Camden  
To: PlanningPolicy  
Subject: Camden's draft new Local Plan

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Please see attached our written submission in respect of the draft New Local Plan.

We would be grateful if you could confirm receipt.

Sincerely

Climate Emergency Camden



## **CAMDEN'S draft NEW LOCAL PLAN**

### **Comments by Climate Emergency Camden's Built Environment Group**

27th June 2025

Climate Emergency Camden (CEC) is a non-party-political coalition of local groups and residents in Camden which aims to inspire bold, transformative borough-wide action in response to growing evidence about the threat to people and planet from catastrophic climate and ecological breakdown. CEC was established in April 2019.

## **1 SUMMARY**

We believe that the prioritisation of 'growth' for its own sake, without a sound basis of need, will result in ecological harms that are incompatible with future human ability to thrive, or even survive, on this planet.

The Council denies and conceals its own role in promoting harmful development. For example, it routinely fails to consider the up-front emissions caused by construction.

Regarding new development, we are concerned by:

- the prioritisation of 'growth' for its own sake
- its lack of a strategy based on evidence
- failure to consider the long-term consequences of climate breakdown
- lack of hard targets for restraining harmful outcomes and operating within planetary boundaries for sustainable development.

The framing of the Climate and Ecological Emergency within the document is inaccurate and misleading. We are providing a mark-up of the Climate Emergency Section to highlight this issue.

## **2 THE CLIMATE AND ECOLOGICAL EMERGENCY**

The environmental catastrophe that we are facing is the result of unconstrained growth, causing carbon emissions, resource exploitation and lack of protection of our ecosystems. This is well documented and understood. Most national governments assume that the climate crisis will be addressed through technological innovation,

without understanding that this will result in more exploitation and destruction of ecosystems on which we depend.

There is little firm grasp of the need to minimise our ‘ecological footprint’, and shepherd resources to minimise environmental harms. In the case of the development in London these harms are the result of construction of physical infrastructure and new buildings.

We need to limit new construction to what is necessary for human well-being and seek imaginative ways of using and re-using existing resources, i.e. existing buildings and infrastructure.

The ways in which these issues are addressed in Camden’s proposed new Local Plan do not significantly alter business-as-usual development models.

### 3 CAMDEN’S LOCAL PLAN

#### 3.1 Housing

We do not need the vast numbers of private homes that are being built in London Borough of Camden. These are mostly built for generation of profit for pension funds and private companies, and many lie empty. This is a waste of resources and causes a high amount of unnecessary carbon emissions.

Good quality homes should be provided to meet housing need through bringing unused buildings into use, including retrofit of vacant homes. Measures should be taken to reduce the letting of homes through Airbnb for commercial profit and second homes should be discouraged.

Camden Council should stop the demolition of existing housing estates and repair and retrofit them instead. This is feasible for most of the estates that Camden plans to demolish. Retention and refurbishment has better outcomes for existing communities as has been shown by a wide range of research. Urban design issues and the need for additional homes can be dealt with by infill development and public realm improvements, for example the built example at Kiln Pace, NW5, and retrofit proposals for West Kentish Town Estate [REDACTED]  
[REDACTED]

Single family dwellings are also demolished to enable wealthy residents to build larger ones. This should not be permitted where the existing home is adequate. The practice of buying a small home with the intention of demolishing and rebuilding it is prevalent in wealthy parts of the Borough and is not compatible with action on the climate and ecological emergency. Examples include:

- 38 Frognal Lane, ref. 2019/4220/P  
Demolition of existing house, a positive contributor to the Redington and Frognal Conservation Area



- 14 Greenaway Gardens, ref. 2021/6257/P  
Demolition of house, except front façade, this was also a positive contributor.
- 41 Frognal: ref. 2016/4558/P  
Demolition and rebuild of entire house, except façade, another positive contributor (architect Alexander Finder).

These residential developments typically include new basements, which add to the carbon intensity of the construction.

### 3.2 Commercial buildings

We see demolition and rebuild of office space continuing on a business-as-usual basis. There is no effective constraint on the demolition of existing buildings to enable their owners to redevelop for profit. Developers' consultants run rings round planning officers when it comes to reviewing required appraisals for retention options, which inevitably lead to complete demolition or façade retention being justified.

The following four applications, for schemes approved by London Borough of Camden, show where current policy has been shown as inadequate to protect existing commercial and cultural buildings from demolition:

- Selkirk House, ref. 2022/2510/P  
Most of sub-structure and super structure demolished.
- Euston Tower, ref. 2023/5240/P  
Only part of the lift shaft and the foundations retained
- 135 -149 Shaftesbury Avenue, ref. 2024/0993/P and 2024/1005/L  
Façade retention scheme
- 105 Judd Street, ref. 2022/1817/P (2025/1684/P),  
Facade retention scheme with some internal structure retained:

Climate Emergency Camden's previous submissions to LB Camden planning committee regarding these applications are attached as an appendix.

When these schemes are presented by planning officers to the committee, the quantity of up-front carbon emissions are rarely mentioned or assessed in terms of the damage to the ecosphere.

### 3.3 Mitigating climate change

Whole Life Carbon policies are intended to reduce the amount of Greenhouse Gas (carbon) emissions being emitted. This is an urgent matter, as to avert catastrophic climate breakdown we need to radically reduce emissions within the next 10 years. This means that we should be prioritising the reduction of up-front emissions caused by the construction of a building (Modules A1-5). There needs to be fixed targets for the carbon intensity of new construction (Modules 1-5), to make a change to 'business as usual' construction. This should aim to change the nature of construction and vastly increase the likelihood that existing buildings will be retained, converted and re-used, in a way that minimises carbon emissions.

The construction of new basements is particularly high carbon, due to the quantity of concrete and steel required. New basements should not be permitted unless justified by a specific required use.

### 3.4 Retaining existing buildings

The existing and proposed Local Plan policies fail to ensure buildings that are fit for purpose are retained.

The proposed plan itself includes within its Site Allocation Plan the proposed demolition of buildings which are performing well, meeting needs of residents and occupants and should not be demolished. Examples of this are:

[250 Euston Road](#), a fully functioning NHS building, enjoyed by occupants and creating a peaceful residential square behind its frontage.

[Gilbey's Yard](#) and [Juniper Crescent](#), award winning housing association homes built 28 years ago.

[Wendling Estate](#) and [West Kentish Town Estate](#) are included for demolition even though in the case of Wendling a viable infill scheme was drawn up by Peter Barber Architects. In case of West Kentish Town Estate, retrofit and infill has been investigated by a RIBA-funded research project, by Camden have not considered it.

### 3.4 Circular Economy

Circular Economy policies are intended to reduce the amount of material extraction occurring around the world, and the impact of the pollution that results from waste materials on ecosystems. Extraction and emissions are linked, i.e. a new building will result in new emissions and new extraction, both of which cause environmental harms. However, they are different issues.

What occurs at present is that Circular Economy policy is used to justify the demolition of existing buildings without considering the carbon emissions that will result. The thinking is along the lines that “it is ok to demolish this in-situ concrete building because we are going to grind the concrete up into aggregate and re-incorporate it into new construction” (normally elsewhere in a low-grade use such as road bases). The problem is that this process causes a high level of carbon emissions and does not prevent the large amount of new materials and emissions, resulting in environmental damage globally.

### 3.5 Operational energy

The London Mayor, permits developers to offset operational carbon targets not met, for example:

Demolition and rebuild of 100 Gray’s Inn Road and 127 Clerkenwell Road, 2022/4259/P, a total of 1,302 tonnes CO<sub>2</sub> were off set.

Demolition and rebuild of 95-100 Tottenham Court Road, 2020/5624/P, a total of 4,530 tonnes CO<sub>2</sub> were off set.

Redevelopment of Belgrove House, 2020/3881/P, a total of 7,116 tonnes CO<sub>2</sub> were off set.

Carbon offset payments do not actually offset the carbon targets that are missed. Developers pay £95/ tonne CO<sub>2</sub>e, but it costs up to £400 / tonne to make energy reductions to offset the equivalent emissions.

This shows that the Carbon Offset Fund mechanism is not working and should be abandoned. Off-setting generally does not work, due to the inability to truly offset the actual environmental harms resulting.

Developers should develop schemes that meet the requirements, even if that results in a development that does not fully exploit the land-value.

#### *Appendices:*

- 1) comments on wording of Section 8
- 2) examples of submissions made by CEC in respect of planning applications in Camden



CLIMATE EMERGENCY CAMDEN  
DRAFT SUBMISSION ON CAMDEN'S DRAFT LOCAL PLAN  
Appendix

Climate Emergency Camden's comments on the framing of the Climate and Ecological Emergency in the draft new Local Plan are in red. The original proposed Local Plan text is in black.

## Chapter 08 - Responding to the Climate Emergency

It should say 'Climate and Ecological Emergency' as the impact of unconstrained growth on global ecosystems is as much a threat as climate change.

8.1 The Climate Change Act 2008 (as amended) sets a legally binding target for the UK to bring all greenhouse gas emissions to net zero by 2050.

What does this mean for LBC's planning policy? There is no acknowledgement of the implications of the Act.

8.2 The Council declared a Climate and Ecological Emergency in 2019, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and set out its ambition to do everything it can to make Camden net zero by 2030. This means we need to reduce all the carbon dioxide emissions associated with fuel consumption within the boundary of the borough to zero by 2030.

This is not possible, and this should be acknowledged.

8.3 The Council's Climate Action Plan sets out a number of actions to help achieve this.

This is not true. There are very few actions that result in a measurable decrease in carbon emissions.

This will also be supported by the Council's Local Area Energy Planning (LAEP) work which is considering the impact and implications of the following key project areas for Camden:

- fabric efficiency including the retrofitting of existing buildings;
- heat networks;
- heat electrification including heat pumps;
- renewables including solar photovoltaics (PV);
- and electric vehicle charging.

8.4 We Make Camden, the Council's Corporate Strategy, emphasises the need to adapt to meet the climate challenge that faces us, address the causes of the climate emergency and work towards becoming net zero, while ensuring that we are supporting and protecting members of our communities from the impacts of climate change.

8.5 The Local Plan is a key mechanism for addressing the climate and ecological emergency and delivering the actions identified in the Council's Climate Action Plan and We Make Camden.

By the time the Local Plan is approved there will be a new Climate Action Plan. This has not yet been confirmed.

Furthermore, the National Planning Policy Framework (NPPF) requires Local Plans to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes and the risk of overheating and drought from rising temperatures.

8.6 Policy CC1 sets out the Council's overarching strategy for addressing climate change, to ensure that new development is designed to mitigate and adapt to climate change to respond to the climate emergency.

### **Policy CC1**

Responding to the climate emergency

The Council will expect development to prioritise the provision of measures to mitigate and adapt to climate change. Development should meet the highest feasible environmental standards during construction and occupation and respond to the climate emergency by:

1. prioritising and enabling the repurposing and re-use of existing buildings over demolition;

This is not borne out by the detailed site-based policies. The Site Allocations give details of buildings that are fit for purpose, serving their occupants well and should not be demolished:

- Juniper Crescent and Hawley Wharf
- 250 Euston Road
- 

It is immoral and hypocritical to propose/ imply the demolition of these buildings, due to the environmental impact that will result.

2. minimising waste and whole life carbon, and increasing the re-use of resources;

This is an existing policy, but one which has not been effectively enforced, as borne out by previous planning application decisions taken by Camden Council. A different approach to planning will be required to achieve any significant benefit from this policy.

"minimising waste and whole life carbon' are two separate issues, although linked. It would help to assess them properly if they were treated separately, with separate policy clauses.

**Whole Life Carbon policies** are intended to reduce the amount of Greenhouse Gas emissions being emitted. This is an urgent matter, as to avert catastrophic climate change we need to radically reduce emissions within the next 10 years. This means that we should be **prioritising the reduction of up-front emissions** caused by the construction of a building (Modules A1-5). There need to be fixed targets for the carbon intensity of new construction (ie. Modules 1-5) that make a difference to 'business as usual' construction. This should aim to change the nature of construction and vastly increase the likelihood that existing buildings will be retained, converted and re-used, in a way that minimises carbon emissions.

**Circular Economy policies** are intended to reduce the amount of material extraction occurring around the world, and the impact of the pollution that results from waste materials, because of the effect on ecosystems. Extraction and emissions are linked, ie. a new building will result in new emissions and new extraction, both of which cause environmental harms. However, they are different issues.

What occurs at present is that Circular Economy policy is used to justify the demolition of existing buildings without considering the carbon emissions that will result. The thinking is along the lines that “it is ok to demolish this in-situ concrete (or other) building because we are going to grind the concrete up into aggregate and re-incorporate it into new construction” (normally elsewhere). The problem is that this process causes a high level of carbon emissions and does not prevent the large amount of new materials and emissions, resulting in environmental damage globally.

3. supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building;
4. ensuring that new buildings are designed and constructed to be net zero carbon in operation;

Camden, along with the London Mayor, permits developers to offset operational carbon targets not met, for example:

Carbon offset payments should not be permitted, as they do not actually offset the carbon targets that are not met. Developers pay £95/ tonne CO<sub>2</sub>e, but it costs Camden up to £900 / tonne to make energy reductions to offset the equivalent emissions.

Camden Council has collected £6.8m since 2016 through Section 106 carbon offset payments, offsetting 84,708 tonnes CO<sub>2</sub>e. So far it has only spent £1.22m. If the average cost per tonne is £300, that would be a total of 4,073 tonnes, which is 5% of the total offset. This shows that the Carbon Offset Fund mechanism is not working and it should be abandoned. Off-setting generally does not work, due to the inability to truly offset the actual environmental harms resulting.

Developers should develop schemes that meet the requirements, even if that results in a development that does not fully exploit the land-value.

5. utilising low carbon technologies and maximising opportunities for renewable energy generation and heat networks;
6. being designed to be resilient to climate change by minimising the risk of overheating, improving water efficiency, and minimising and avoiding the risk of flooding from all sources;

This should take into account the likelihood that the Thames will flood significantly in future, and that the Thames barrier will be significantly challenged by 2050.

7. protecting and enhancing existing green spaces and water sources, enhancing biodiversity, strengthening nature recovery and providing multi-functional green infrastructure;
8. mitigating and improving poor air quality in the borough; and



This is an environmental pollution issue and should not be in a policy about mitigating and adapting to climate change, as it is not relevant to that objective.

9. prioritising sustainable transport.

There should be an explicit statement regarding **how** this is expected to reduce carbon emissions.

The Council will expect developers to demonstrate how sustainable development principles have been incorporated in the design and proposed implementation of their scheme. For developments creating one or more additional homes or delivering 500 sqm or more of additional or re-provided floorspace a Sustainability Statement will be required.

Fighting climate change is beyond the remit the remit of 'Sustainable Development', which implies that there is a stable environment that can be protected from damage if development is 'sustainable'. It needs a more truthful framing of the context, to get across the gravity and importance of the situation. There needs to be statement within this explaining how the minimisation of the reduction of carbon emissions in the short term has been prioritised.

8.7 This policy sets out the Council's overarching approach to responding to the climate emergency and should be read in conjunction with the other policies in this Chapter, in addition to other relevant policies in the Plan, including but not limited to, Policy D1 (Achieving Design Excellence); D4 (Extensions and Alterations); D5 (Historic Environment); D6 (Basements); IE2 (Offices); SC4 (Open Space); NE1 (The Natural Environment); NE2 (Biodiversity); NE3 (Tree Planting and Protection); NE4 (Water Quality); T1 (Safe, Healthy and Sustainable Transport); T2 (Prioritising Walking, Wheeling, and Cycling); T4 (Shared Transport Infrastructure and Services); T6 (Sustainable Movement of Goods, Services, and Materials); and A3 (Air Quality), which provide more detailed policy and guidance.

Policy D1 (Achieving Design Excellence): this policy focusses too much on aesthetic issues and not enough on environmental design.

Policy D6 (Basements): basements should be prohibited on the grounds that they use an excessive amount of cement and steel, the manufacture of which causes around 15% of global emissions.

**Email to Camden planners regarding planning application 2022/2510/P\_Selkirk House**  
**22.10.23**

Dear David Fowler,

Climate Emergency Camden welcomes the fact that Camden Council is using qualified external consultants to advise planning officers about the carbon impact of new development.

In relation to the Selkirk House planning application, we have reviewed the final issue the Independent Review of the Retention & Redevelopment Options Study, issued 20.10.23, and make the following comments:

**Ref. page 15:**

The use of the building for residential has not been shown to be unfeasible. The report states:

*“The last claim on unsuitability of residential use in Selkirk House tower should be supported by further evidence and data. The applicant should clarify what would be the maximum floor-to-ceiling height achievable for residential use. Inability to provide dual aspect flats should also be proven.”*

Given that the Borough’s need is for more residential not more commercial space, it is obvious that this needs further consideration before the application is brought to committee.

**Ref. page 21:**

The report states:

*“Our opinion provided as part of the initial review remains unchanged: in absence of more detailed guidance by policy, it’s difficult to argue that the preferred option (Option 4), which involves substantial demolition of existing buildings above ground, is justified in terms of optimisation of resources.*

*The proposed development maximises the site value, delivering more lettable space (NIA) and enhancing site capacity. These benefits however come with a higher cost, in terms of arising demolition waste, new construction materials needed and upfront embodied carbon.”*

This is the most obvious reason to refuse the application: we are facing a climate and ecological crisis, and unless we collectively make extensive efforts avoid unnecessary construction materials needed and upfront embodied carbon, we are headed towards an unliveable future.

**Ref. page 24:**

The report states

*"The arguments provided by the applicant in support of the demolition of floors 4-13 are all valid points, but there is no evidence showing that these issues cannot be overcome through appropriate design measures. As such, retain and improve the floors 4-13 of the existing Selkirk House doesn't seem beyond the realms of possibility."*

It is clear that the report's authors agree that the requirement for demolition is not proven and is not justified.

In summary, we think that the following actions are necessary before making recommendation for determination of the application and proceeding to committee:

1) Planning officers should require the building to be properly considered for residential use, as required by planning policy (Camden's Local Plan requires reuse of existing buildings to be prioritised).

2) If planning officers believe that the minor and unnecessary benefits to the urban realm or the increase in lettable office space justify the damage to the climate and the planet's ecosystems, they must explain in specific terms to the planning committee on what basis they have made this value judgement. They should be aware that continued 'business as usual', as represented by this proposal, is not acceptable in this time of climate and ecological crisis and that they will be held to account for decisions that will cause harm to human health and livelihoods.

Yours sincerely

Built Environment Group  
Climate Emergency Camden

## WRITTEN SUBMISSION and DEPUTATION

### Redevelopment of Euston Tower

Planning application ref. 2023/5240/P

16.03.25

Climate Emergency Camden opposes this application. We examined the original application and made a submission early in the consultation period. The scheme has been altered since the application was submitted. The proposed Gross Internal Area has been enlarged by 2,300m<sup>2</sup>, meaning that building area increase has **gone up from 41% to 45.6%**. The development remains greedy.

As we show below planning officers have ignored the impact of development on current and future generations due to climate breakdown caused by continued high levels of CO<sub>2</sub>e emissions in assessing the application.

### ASSESSING FEASIBILITY FOR REFURBISHMENT

In the Planning Report, officers have sided with the developer instead of safeguarding our ecological systems and wellbeing. Despite saying that “The refurbishment of the existing building is considered technically possible and more sustainable”, they accept the developer’s statement that the existing building is not viable for ‘lab-enabled offices. That should lead planning officers to tell the developer that lab-enabled office is not an acceptable use because the proposed works are incompatible with a future climate that sustains human life and livelihoods.

As usual, the planners have required that the developer carry out a feasibility study looking at options for retention, and as usual the planners have gone along with the developer’s preferences. This is a form of performance that planners think is necessary to show that they are doing their job, but it is worthless. These expensive exercises, requiring appointment of multiple specialist consultants, always come to the same conclusion: the developer can do just what they like to the environment. To pretend that this a ‘Partial Retention and Extension’ option is a fallacy. It is a new building, as stated in the planning application title.

The existing building is being demolished because of the lab space component of the proposed building’s use. The Independent Review states, *“If lab space is a driver for the future use of the building, additional floor-to-floor height will be required over and above the contemporary office requirement”*.

In this case there isn’t even a client identified for the building- this is a speculative development.

### ENVIRONMENTAL IMPACTS

The revised up-front carbon emissions resulting from construction have **increased from 55,000 tonnes CO<sub>2</sub>e to 56,000 tonnes**. It is a shame that engagement with Camden’s planners over the past year has not resulted in a *decrease*. Why not?

Planning officers do not mention the quantity of up-front carbon emissions due to construction in the report. It is concealed within the Whole Life Carbon assessment and then given as a rate per m<sup>2</sup>. The CO<sub>2</sub>e/m<sup>2</sup> figure averages emissions over a 60-year period.

The WLC figure is given as 97,780 tonnes CO<sub>2</sub>e, which over 60 years is 1,630 tonnes CO<sub>2</sub>e per year, a much less significant figure than the **56,000 tonnes** that will occur over the next few years if this application is permitted.

Whole Life Carbon assessments make it easier to obfuscate. They ignore the fact that we do not have 60 years to make meaningful changes. As Climate Emergency Camden has reported to the planning committee, to have a chance of staying within 2 degrees of global warming the UK must **radically** reduce its overall carbon emissions now. The planning report does not demonstrate how harmful carbon emissions from construction and associated extraction of virgin materials and resource use really are.

The independent report commissioned from Buro Happold by Camden raises ‘concerns’ about the methods for establishing the ‘magnitude’ of effects on the ‘receiving environment’, saying:

*“Sufficient clarity has not been provided in the updated ES chapter. It is requested that the Applicant provides further clarity on the ICCI methodology, including the climate change sensitivity and vulnerability criteria that have been used, and how these factors have been taken into account in the significance of effect judgements.”*

Climate scientists decry how governments at all levels have not been truthful about climate breakdown ([www.carbonindependent.org](http://www.carbonindependent.org)). The planning report is a case in point. The up-front carbon should be clearly stated and the related harms assessed.

It is disappointing that the GLA has not commented on these crucial matters. They, along Camden officers and members, seem persuaded by British Land’s story that the building is “sustainable” and, moreover, must be adapted for lab-enabled offices.

Nationally we have carbon budgets that should be met if we are to make our contribution to global targets. These are completely ignored in the planning report.

## SUSTAINABLE DESIGN AND CONSTRUCTION

It is symptomatic that ‘Sustainable Design and Construction’ comes way down towards the bottom of the list in Camden’s Planning Report, at item 18. Camden’s planners work hard to get out of the commitments of Camden declaration of a Climate and Ecological Emergency. They don’t scrutinise the high carbon footprint of the development or recognise expanding the building area by 45.6% is problematic. They swallow a false idea that recycling the demolition material validates the proposal.

Current circular economy policy gets developers off the hook too easily. On top of the 56,000 tonnes CO<sub>2</sub>e caused by the construction of the new building, there will also be unquantified carbon emissions caused by unnecessary recycling of demolished building fabric.

Regarding carbon emissions caused through use of the building (‘operational carbon’), the development does not meet the policy targets, meaning that a carbon offset payment of £716,023 must be paid to the Council (at the rate of £95/tonne CO<sub>2</sub>/yr). The money is supposed to be spent on carbon reduction measures around the Borough, but the offset process is flawed. An equivalent emission saving costs around three times the offset amount and even then Camden struggles to dispense offset money which is accumulating at an alarming rate. It is plainly much more efficient to make developers meet climate change targets by building actually sustainable buildings or by using existing buildings appropriately to limit construction work.

CEC’s focus is the environmental impact on human wellbeing due to climate and ecological breakdown. We urge the Committee to refuse permission of British Land’s harmful development on the grounds that it worsens the risk of irreversible climate breakdown with catastrophic impacts for all of humanity.



Sadiq Khan



5<sup>th</sup> May 2025

Dear Mr Mayor,

**Camden Council Reference: 135 -149 Shaftesbury Avenue  
2024/0993/P and 2024/1005/L**

Climate Emergency Camden is a coalition formed in 2019 to give strong voice to advocacy for action on the Climate and Ecological Emergency, within LB Camden.

We are writing to request that under the powers afforded to you under article 6 of the Mayor of London Order (2008) that you direct refusal on the above applications for Planning Permission and Listed Building Consent. If you are not minded to direct refusal, then under the power afforded to you under article 7 of the Mayor of London Order (2008) and 2A of the Town and Planning Country Act 1990 we respectfully invite you to call-in the applications for Planning Permission and Listed Building Consent.

We have made representation to Camden's Planning Committee on the following grounds:

#### DEMOLITION OF THE EXISTING BUILDING

This application is for the demolition of an existing building, which is listed, except for the front and side façades, and building of a new one. A façade retention scheme does not 'repair and restore' an existing building, it destroys it.

It will of course cause 'harm' to a building if you demolish it. It is no longer a building, but a retained façade. This application description does not make this clear. To call the upper parts of the building a 'roof extension' is also erroneous. It is a new, very large building, sitting behind the screen of the retained façade.

Objections to the scheme have been ably made by heritage organisations Historic England, 20<sup>th</sup> Century Society and SAVE, as well as many other amenity societies.



The applicant wants to build a large hotel on the site and is demolishing the existing building to do so. It should not be permitted for several reasons, including the impact of the excessive bulk on neighbours. Climate Emergency Camden would like to highlight the harm caused by high amount of carbon emissions resulting from the proposed development as a principal reason for refusing this application.

## ENVIRONMENTAL IMPACT

### **Carbon emissions caused by construction**

The officer's report contains no evaluation of the global environmental harms caused by the carbon emissions resulting by the construction of the new building. The building will cause a high level of unnecessary carbon emissions which should be avoided at this critical time for climate mitigation.

As is usually the case with Camden's planning reports, the total quantity of carbon emissions is not mentioned (it is **10,228 tonnes CO<sub>2</sub>e**, on top of the 56,000 tonnes just approved for the demolition and rebuilding of Euston Tower); yet another planning application recommended for approval without consideration of the existential threat of climate breakdown. The large amount of carbon-heavy construction being permitted in Camden is not in accordance with the carbon budgets set by the Climate Change Committee and is not compatible with retaining a liveable climate for billions of people.

Retaining the existing theatre would avoid these harms. The new basement has a particularly high carbon footprint, requiring an excessive amount of excavation and use of concrete and steel to form a new structure. This was raised by the Camden Design Review Panel.

This, alongside the heritage harms, should lead officers to reject the unnecessary demolition of the existing building.

### **Carbon emissions caused by operation of the building**

The officers' report confirms that the building is high carbon in terms of operational carbon, and makes the following recommendation:

*"14.27 **Consideration** should be given at the next design stage to any additional opportunities to reduce the carbon impact of the building in operation through additional consideration of energy efficiency. Condition 10 is recommended to require a **feasibility study** with the aim of maximising energy efficiency measures."*

This is **completely inadequate** as development control. The scheme should not be granted consent of any kind until the applicant has designed a building which meets Camden's energy efficiency requirements. The design is plainly profligate in its use of glazed curtain walling and brick 'fins'. These are an inherent part of the design and should not be permitted; they cannot be magically turned into a compliant design

through an optimistic clause like this. Camden's Design Review Panel have picked up this up; why have Camden officers not required better?

Carbon-offset payments are proposed by officers, as is usual, to make up for lack of compliance. It should be noted by committee members that these carbon-offset payments do not actually offset the carbon emissions that will result from the development. This is because the developer only pays £95.00 tonneCO<sub>2</sub>e, but it costs up to several times that amount for Camden to fund an equivalent amount of emissions savings elsewhere in the Borough. The system fails to meet Camden's 'zero-carbon' commitments and is effectively **greenwash**.

#### CAMDEN DESIGN REVIEW PROCESS

The Camden Design Review Panel in its most recent report, states that it “**remains concerned that other issues remain unresolved**, including the project's **embodied carbon intensity, impact on the Phoenix Garden**, deliverability, and risk of **damage to the listed building**.”

#### DECISION BY CAMDEN'S PLANNING COMMITTEE

Camden's Planning Committee approved the applications, and we believe that they were wrong to do so.

Yours sincerely

**Climate Emergency Camden**

A black rectangular redaction box covering the signature and name of the sender.

**Email to Camden planners regarding planning application 2025/1684/P, 105 Judd Street**  
**08.06.25**

Dear Sam Fitzpatrick,

We write regarding the above application, which we would like to be recorded as an objection:

The original permitted scheme (2022/1817/P) proposes demolition of practically all the internal structure except for the floor slabs, which require extensive propping whilst new structure is inserted. Extending the building upwards results in works so extensive that they can no longer be considered 'alterations' and should be considered a new building, including:

- Replacement of the internal vertical structural elements
- Provision of new foundations
- Upgrading of the fire resistance of retained floor beams

Climate Emergency Camden wants to see existing buildings retained, but in this case the level of replacement of existing construction with new construction is very high and results in a high level of harm to the environment and people, through excessive carbon emissions and the impact of resource extraction globally. It would have been possible to retain and use the existing building for office use without the extensive harms due to the new construction that have already been permitted.

#### **EMBODIED CARBON**

We are concerned that planning permissions of this nature are granted without any requirement provided in Section 106 agreements that the developer should meet carbon targets for the new construction (ie. Modules A1-5 of the Whole Life Carbon Assessment). Operational carbon targets are protected by the Section 106, but not 'embodied carbon'.

The WLC reporting spreadsheet accompanying the original application states that the carbon intensity of the concrete will be reduced using GGBS (Ground Granulated Blast Furnace Slag). Similarly, the structural steel is proposed to employ a 'high' recycled rate. These supposed intentions are not required to be complied with via the Section 106 agreement. In addition, the developer could alter the extent of original fabric retained during construction, increasing the WLC, as this is not sufficiently tied down by the Section 106 agreement, which only states requirements to:

(a) achieve the targets set out in the submission document entitled Sustainability Statement produced by Norman Disney & Young dated 13 April 2022

This does not include the stated proposed carbon footprint of the new construction as a target, ie. Modules A1-5 which is given as 3,689 tonnes CO<sub>2</sub>e, or any requirement to

measure and report on the actual emissions resulting from Modules A1-5 on completion of the building.

#### OPERATIONAL CARBON

The operational energy requirements for the whole building should be as for new build, as it does not make sense to consider the lower floors as 'refurbishment' legitimising lower performance.

#### CURRENT APPLICATION 2025/1684/P

**A new WLC assessment should be provided to reflect the additional construction proposed in the current application. This is missing from the current application documents uploaded on the planning website.**

The performance of the building in terms of carbon emissions produced in construction, ie. Modules A1-5, should be an explicit target required to be met. It is currently excluded from the Section 106 agreement, and this should be rectified under this application.

Yours sincerely

Climate Emergency Camden

Date: Fri, 27 Jun 2025 14:08:30 +0000

From: MORFUDD RICHARDS

To: PlanningPolicy

Subject: Objection to site C27 - land east of Constable House Adelaide Road  
(Traveller site)

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I would like to state my objection to the proposed plan for a gypsy and traveller site at site C27  
Adelaide Road

The area is already overcrowded and there is a new development in Progress next to Chalk Farm  
tube

I believe the site is smaller than Camden Council's own recommendations

Kind regards

MORFUDD RICHARDS

[redacted email]

Date: Fri, 27 Jun 2025 14:11:15 +0000  
From: Transition Kentish Town  
To: PlanningPolicy  
Subject: Camden's draft new Local Plan

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1) In general Transition Kentish Town supports Camden's overall policy aims and strategy proposals for safeguarding and strengthening Nature and the natural environment in our Borough.

2) And we urge Camden to maintain these commitments in their finalised plan, in the face of any counter comments that seek to reduce the interconnected and mutually supportive benefits to Nature and Community in both future developments and present commitments.

3) We look to Camden to advocate for the Rights of Nature , and for our local communities Rights to Nature, in any debates on the value of Nature in housing, transport and workplace and leisure developments in our borough. It is regrettable national UK Government has allowed itself to become snared in the mistaken rhetoric that pits the Rights of Nature against the Rights of Communities (or commuters, in the case of HS2 routing). Their needs and benefits are interdependent and can be mutually supportive if managed well. Giving space to Nature, and safeguarding natural habitats, not only improves Nature's wellbeing, but also that of local communities brought into greater proximity to Nature. This is evidenced in a growing body of research that describes the benefits living more closely with Nature brings to human mental and physical health, and to local community cohesion and resilience, See TKT Nature Connections for further information on this. Nature Connections - Transition Kentish Town News and Events

4) We strongly support your proposal for a large-scale Camden Nature Corridor in the draft Local Plan, as we urgently need to restore nature in our Borough and to bring more nature into our neighbourhoods, to address climate change and improve well-being. New housing, commercial and leisure proposals on the Kentish Town Railwaylands and Murphy's Yard development areas create a unique opportunity to do this by improving nature in Camden Sites of Interest for Nature Conservation and connecting them through new developments. Therefore, we strongly support Policy C1 paragraph 19 and Policy N1 paragraph 7 to create this Corridor from Hampstead Heath through North and Central Camden, and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page 120), Regis Road (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).

5) We also urge Camden to develop a strong narrative that shares these benefits with local residents at a smaller scale and more local levels, and encourages them to embrace Nature in how they support their local green spaces and care for their individual and community gardens. To provide guidance that explains and supports this, in terms of HOW more wildlife friendly gardening maintains our planet life support systems, like pollination of food crops by pollinating insects, and cooling and air-cleansing photosynthesis by urban trees. To provide information to motivate home owners, landlords and developers to build in habitat restoring features like swift and other bird and insect nest boxes and wild garden habitat areas. And to leave more unpaved garden spaces, that also mitigate flooding from increasing extreme weather events caused by climate breakdown we are increasingly experiencing. Actively championing these goals, values and actions, and supporting local residents to participate in safeguarding, enjoying and benefitting from caring for Nature in their communities, should be integrated into the Camden Plan.

Thank you.

Transition Kentish Town



Date: Fri, 27 Jun 2025 14:12:18 +0000

From: Shreya

To: PlanningPolicy,

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

---

To: Camden Council

Subject Ref: Camden Local Plan – Objections to Site C27

Deadline: 5 PM, Friday 27th June 2025

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

Our objection is based on the following concerns:

### **1. Overcrowding and Inadequate Space**

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

### **2. Lack of Green Space and Environmental Impact**

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

### **3. Transport and Infrastructure Strain**

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

### **4. Safety and Access Concerns**

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

### **5. Impact on Local Community and Cohesion**

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













### **6. Planning Process Transparency**

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

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

Signed,

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

Michael Levy		
Raymond Dinkin.		
Kathy Cohen		
Daniel Levy		
Sherrill Maisel		
Franziska Voigt		
Julian Sieber		
Gabriela Angelova		
Amy Needleman		

Peter Crossley	<div></div>	<div></div>
Jessica Crossley	<div></div>	<div></div>
Dan Levy	<div></div>	<div></div>
Gary Napier	<div></div>	<div></div>
Helen Napier		
Hugh Napier		
Giles Napier		
Somerset Napier		

Date: Fri, 27 Jun 2025 14:08:39 +0000  
From: Harriet Bevan  
To: PlanningPolicy  
Subject: Proposed relocation of Regis road recycling centre

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Dear Camden Council Regeneration and Planning Teams,

I hope this message finds you well.

My partner, Hugo and I wanted to contact you as long-term Camden residents and homeowners in [REDACTED] 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,

Harriet Bevan and Hugo Lau



Date: Fri, 27 Jun 2025 14:13:21 +0000  
From: Katy Davis  
To: PlanningPolicy  
Subject: Camden Local Plan - Proposed Submission Draft 2025

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Partner

[redacted]

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[redacted] [redacted postcode].

## 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.

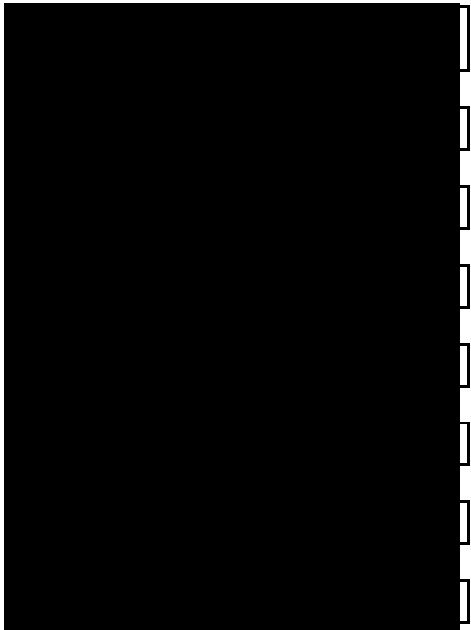
Before completing this representation form please refer to the attached guidance notes.

### 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"/>	Mrs
First Name	<input type="text"/>	Jenny
Last Name	<input type="text"/>	Turner
Job Title	<input type="text"/>	
(where relevant)		
Organisation	<input type="text"/>	
(where relevant)		
Address Line 1*	C/O Agent	
Address Line 2	<input type="text"/>	
Post Town*	C/O Agent	
Post Code*	C/O Agent	
Telephone Number	<input type="text"/>	
E-mail Address	<input type="text"/>	

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

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

Name or Organisation: Carter Jonas

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

Documents can be found at the following links:

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

Paragraph

Policy

Site  
Allocation  
Policy S10

Policies Map

Allocation S10

**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"/>

\*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 checked="" type="text" value="X"/>

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

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

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

These representations are submitted to outline why the current wording of Site Allocation Policy S10 (Bangor Wharf and Eagle Wharf) would result in the site being undeliverable. As currently drafted, the policy is unsound. To explain this in detail, we provide an overview of the site history and constraints of the site which provide pertinent background, before reviewing the proposed housing numbers that are allocated to the site, and what other uses could instead be more suitable and deliverable.

### Planning History

Since 2013 and the adoption of Camden's Site Allocations Local Development Document, the site has benefited from a Site Allocation (SA35). The allocation was taken forward in the currently adopted Local Plan (2017). The allocation envisaged more intensive use of the site with replacement flexible employment floor space and making the most of the site's capacity for housing. It also required any future development to make the most of the opportunities to respond to the canal setting and provide an active frontage to Georgiana Street.

For more than 10 years, development proposals have sought to come forward on this site. This includes:

- Pre-application discussions dating back to 2015;
- A refused planning application in 2016 for 46 homes and flexible employment space, across a six storey building;
- A dismissed appeal (ref: APP/X5210/W/16/3165200) of the above scheme in 2017; and
- Extensive further pre-application discussions in recent years.

It has been 12 years since the site was first allocated and yet, it still does not benefit from planning permission for redevelopment, let alone being delivered for an alternative use.

### Site Constraints and Wider Area

The existing buildings on site are not of any particular merit and were last in employment and storage use some time ago. The appeal decision notes that the buildings detract from the character and appearance of the area. Yet over the course of 10 years, the site remains to be redeveloped, continues to deteriorate, and is an eyesore.

The site is highly constrained. It is located within the Regent's Canal Conservation Area and it is adjacent to three storey residential properties on Royal College Street which are Grade II Listed. There are also further statutory heritage assets within the immediate area. To the east is the Regent's Canal which has an open character and setting. These planning and site relations pose significant physical constraints to delivering residential use due to impacts on amenity, daylight and sunlight. This was evidenced by the dismissed appeal in 2017 (ref: APP/X5210/W/16/3165200) where the Inspector considered the residential use on the site would result in "*a strong sense of intrusiveness*" for the occupiers in Royal College Street. The Inspector concluded that there would be a combination of reduced outlook, private and daylight for existing residents resulting from the proposed residential use on the site. This indicates that a residential scheme on this highly constrained site, is not suitable.

To the south is St Pancras Commercial Centre which secured planning permission in 2020 (ref: 2019/4201/P), for redevelopment to provide mixed use development of light industrial floorspace, office floorspace, flexible retail floorspace, 33 self-contained dwellings and associated works. This development has been constructed and consists of three buildings of six to seven storeys. The buildings closest to the site are six storeys indicating that considerable mass and height could be possible on Bangor Wharf whilst remaining sensitive to the Conservation Area and adjacent canal setting.

### Housing Allocation

Site Allocation S10 outlines that approximately 50 homes could be developed on Bangor Wharf and Eagle Wharf. We contend that it is not viable to deliver residential development on the site. This has been demonstrated by the chequered planning history of the site, as outlined further above. Indeed, the former owners of Bangor Wharf have had receivers appointed over the Property due to the financial challenges of trying to deliver a residential scheme on the site. It is not commercially viable to deliver residential uses on Bangor Wharf and therefore as the currently worded, the site cannot be relied upon to form part of the Council's five year housing land supply. As currently drafted, the residential element of Site Allocation Policy S10 is unsound.

### Ownership

Bangor Wharf and Eagle Wharf are in two separate ownerships. There is firm commitment to develop Bangor Wharf to deliver a suitable and viable use that addresses the constraints of the

site, and provides positive enhancement to the character of the area. It is unclear if there is such desire to redevelop Eagle Wharf which is constrained by the existing building. Co-joining these two separate sites into one site allocation frustrates delivery. The site allocation should be separated into two site allocations with the housing use focused on Eagle Wharf, which is more suitable for residential use using the existing building, and employment use allocated on Bangor Wharf. It is noted that the appeal scheme in 2017 only concerned Bangor Wharf – there has never been a scheme forthcoming that combines the sites.

Office/Life Science use

Due to the site's constraints, the site is much more suitable for employment uses such as office, laboratory or life science uses.

Life sciences is a key growth sector in London, as highlighted in the Mayor's recent consultation on a new London Plan up to 2050. The draft London Plan is keen to support a much more diverse range of jobs and businesses such as life science to not only assist the economy but to support the vitality of cities and town centres. This is particularly true on this site which has been redundant and vacant for an extended period of time and the dilapidated site clearly detracts from the value of the Conservation Area and wider townscape. Redevelopment is vital but it is essential that the site allocation supports uses that are suitable, deliverable and sustainable. Housing is not considered a suitable or viable use whereas employment use is feasible.

(Continue on a separate sheet if necessary)

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

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

The following modifications are requested to make Site Allocation Policy S10 sound and legally compliant:

- Eagle Wharf and Bangor Wharf should be separated into two site allocations, to align with ownership. Bangor Wharf should be allocated for employment uses and the housing use should be allocated to Eagle Wharf.
- If the allocation is not separated into two, then the housing allocation should be removed from Site Allocation S10, as it is not a viable or suitable use. This amendment to the allocation will ensure a viable employment use can come forward that is suitable and deliverable, which is a key requirement for a legally sound policy.

(Continue on a separate sheet if necessary)

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**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:

Without amendments to Site Allocation S10, the policy is considered unsound. Eagle Wharf and Bangor Wharf should be separated into two allocations with employment use focused on Bangor Wharf and the residential use on Eagle Wharf. We request to outline why Bangor Wharf is only suitable for employment uses and not residential. If the policy wording is not amended to a viable use, the site could remain undeveloped for decades.

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



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

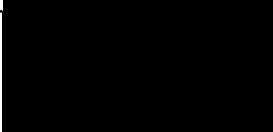
(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector's Report is published	X
(c) when the Camden Local Plan is adopted	X

**Privacy Notice**

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

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

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

11. Signature:		Date:	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 15:13:35 +0100

From: Rhona Carmona

To: [redacted]

Subject: Subject: Formal Objection to Proposed Gypsy/Traveller Site at Constable House

---

I am writing as a local resident to formally object to the proposed development of a Gypsy/Traveller site at Constable House, Camden, NW3.

While I respect the need to accommodate the Gypsy and Traveller community within appropriate planning frameworks, I have significant concerns regarding this particular proposal and its potential impact on the local area.

The proposed site is located in close proximity to our local schools such as Primrose Hill School and St Pauls. This area is not suitable for such a development due to its lack of infrastructure, potential strain on local services, and incompatibility with the existing land use and character of the area.

The access routes to the proposed site are narrow and not designed for increased traffic from larger vehicles such as caravans and associated support vehicles. This raises serious concerns about road safety, congestion, and potential hazards for pedestrians, particularly children and elderly residents.

The development would have a detrimental impact on the landscape and visual character of the area. It may also pose risks to local biodiversity, especially if it encroaches on greenbelt or protected land.

There has been insufficient consultation with the local community regarding this proposal. Residents should have the opportunity to voice their concerns and participate in the decision-making process, especially for developments that may significantly affect their daily lives.

An increase in the local population, even temporarily, may place additional pressure on already stretched services such as healthcare, education, waste collection, and policing. No clear plan has been provided to address how these services would be supported.

I respectfully urge the planning committee to carefully consider the legitimate concerns of local residents and to reject this application on the grounds outlined above. A full impact assessment and broader community consultation should be required before any further steps are taken.

Yours faithfully,

Rhona Carmona



Date: Fri, 27 Jun 2025 14:19:22 +0000

From: anais nahum

To: planningpolicy@camden.gov.uk

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

---

I write this representation not only as a solicitor, but also and above all as a future mother. My husband and I made the conscious choice to move out from a more central area of London, Notting Hill, in order to find a place that would offer the peace, safety and stability we wanted for our family. Though Eton College Road is less central and less convenient for work purposes, we deliberately prioritised a quieter, more residential environment to start this next chapter of our lives.

We chose our home on [redacted] precisely because of its calm, clean and safe character, rare and precious attributes in London. The immediate area surrounding Eton Hall, Eton Rise, and Eton Place stood out to us for its quiet dignity, strong community fabric, and family-friendly atmosphere.

The proposed allocation of Site C27, located directly opposite our residence, would jeopardise all of that. The transformation of this space into a permanent traveller site would **drastically** alter the residential nature of the area and is, in our view, deeply inappropriate. As things stand, should this proposal move forward, we would be forced to consider leaving the neighbourhood entirely, a decision that would be both heartbreaking and costly.

Beyond personal impact, I also wish to express, in line with the New Etons Residents Association (NERA), that the proposed allocation of Site C27 is unsound under paragraph 35 of the National Planning Policy Framework (NPPF). It fails the key tests of justification, effectiveness, and consistency with national policy, and appears to have been selected without a transparent or evidence-based process, nor proper community consultation.

For all these reasons, both personal and legal, I respectfully urge Camden Council and the Inspectorate to remove Site C27 from the Local Plan, and to identify more appropriate alternatives through a transparent, community-driven approach.

Please find attached my letter of representation.

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

I thank you in advance for according our representations the appropriate level of attention.

Yours faithfully, Anaïs NAHUM

## FORMAL REPRESENTATION

**Dear Sir/Madam,**

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

Dear Sir or Madam,

I write this representation not only as a solicitor, but also and above all as a future mother. My husband and I made the conscious choice to leave more central areas of London, including Notting Hill, in order to find a place that would offer the peace, safety and stability we wanted for our family. Though Eton College Road is less central and less convenient for work purposes, we deliberately prioritised a quieter, more residential environment to start this next chapter of our lives.

We chose our home on [redacted] precisely because of its calm, clean and safe character — rare and precious attributes in London. The immediate area surrounding Eton Hall, Eton Rise, and Eton Place stood out to us for its quiet dignity, strong community fabric, and family-friendly atmosphere.

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For all these reasons, both personal and legal, I respectfully urge Camden Council and the Inspectorate to remove Site C27 from the Local Plan, and to identify more appropriate alternatives through a transparent, community-driven approach.

### PERSONAL DETAILS

**Name:** NAHUM Anaïs

[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

## **REASONS**

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

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



**Conclusion**

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

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

I thank you in advance for according our representations the appropriate level of attention.

Yours faithfully,

Date: Fri, 27 Jun 2025 15:20:30 +0100

From: chrystal.ohoh

To: [redacted]

Subject: Objection to Site C27 for Gypsy and Travller Site

---

Please see attached my objection letter to Site C27 allocation (Land East of Constable House, ADelaide Road) as a Gypsy & Traveller site in the Draft Camden Local Plan.

Yours sincerely,

W. Chrystal Ohoh

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

# **Objection to Site C27 Allocation**

Land East of Constable House, Adelaide Road (Proposed Gypsy & Traveller Site)

**To:** Camden Council Planning Department

**From:** W. Chrystal Ohoh

**Date:** 27.06.2025

**Re:** Objection to Site C27 - Land East of Constable House, Adelaide Road

Dear Camden Council,

I am writing to formally object to the proposed designation of Site C27 (Land East of Constable House, Adelaide Road) as a Gypsy & Traveler site in the Draft Camden Local Plan.

## **The Strategic Importance of Urban Corners**

The proposed site sits at a pivotal urban corner where three major thoroughfares converge. This location represents far more than a simple plot of land—it embodies what urban theorists recognize as the fundamental building blocks of city life. Such corners have been cultural inspirations reflected in literature, as Albert Camus observed, corners are among a city's "most inventive places" where "great deeds and all great thoughts" often begin. They are the natural focal points where destinations, transportation modes, and communities intersect.

This particular corner, situated at the intersection of major roads, exemplifies what should serve as the benchmark for urban renewal in the 21st century. Such intersections are where "people watch and wait," where natural and constructed environments meet, and where the essential infrastructure of city life—drainage, power, and utilities—naturally concentrates.

## **The Case for Community-Wide Benefit**

The strategic location of Site C27 at this significant urban crossroads makes it uniquely suited for a civic or community building that would serve Camden's broader population. Rather than limiting this valuable corner to serve one specific community group, the site's prominent position calls for development that would:

- **Activate the corner** to bring vitality back to the neighborhood
- **Connect rather than segregate** different community groups
- **Maximize the public benefit** of this prime urban intersection
- **Restore the corner's role** as a place where people from all directions naturally meet

## **Urban Design Principles**

The decades-long trend of designing cities for cars rather than people has transformed what should be “lively corners into lifeless intersections.” This proposal represents an opportunity to reverse that trend by creating a community asset that acknowledges the site’s role as a connector of neighborhoods and people.

The convergence of three major thoroughfares at this location creates natural opportunities for:

- Enhanced community interaction and social cohesion
- Better integration of public and private uses
- Improved accessibility for residents from multiple directions
- More efficient use of existing infrastructure and transport links

## **Conclusion**

I urge Camden Council to reconsider the proposed use of Site C27 and instead designate it for a civic or community facility that would better serve the strategic importance of this urban corner. Such a facility would honor the site’s role as a natural meeting point while providing broader community benefits that reflect the inclusive values of modern Camden.

The corner awaits its potential to strengthen our community connections rather than limiting them.

Thank you for your consideration of this objection.

Yours sincerely,

W. Chrystal Ohoh

[REDACTED]

Date: Fri, 27 Jun 2025 14:20:51 +0000  
From: kat barlay  
To: PlanningPolicy  
Subject: : Gypsy site proposal NW3 behind Chalk Farm tube

---

Dear Sir/Madam

We have just been made aware of these proposals meaning there has been no proper consultation. Why weren't we emailed or posted some relevant communication.

This is not at all sensible!!

The area is not suitable for this kind of development. It's within a quiet social area, near a school, close to a recently replanted nature area and close to nearby amenities which will clearly be severely impacted.

What possible sense does it make to locate such a "development" here

And to reiterate, why wasn't there a meaningful consultation period and proper review of the proposals. This is simply railroading a planning application without understanding the local community needs, desires and respect.

We strongly object and demand proper consideration and consultation

Sincerely

Date: Fri, 27 Jun 2025 15:21:25 +0100

From: paola romero

To: [redacted]

Subject: Comments on application for Gypsy and travellers accommodation

---

As residents of Camden ([redacted postcode]), we are extremely concerned of the consequences brought by the Council's proposal on Gypsy and Travellers accommodation near Constable House.

It seems to us this proposal would involve further pressures in terms of density and service facilities in an already highly built area.

Furthermore, given the irregular shaped site plus the small area under consideration, concerns about privacy should be kept into account.

Although we understand the duty of care borne by the council, this proposal seems insufficiently thought through.

Thank you for taking the time to read our objections.

Best wishes

Dr. Paola Romero and David Jaffe

[redacted address] [redacted postcode]

Responder 572

Date: Fri, 27 Jun 2025 14:23:28 +0000

From: Joseph Davidson-Merritt

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

Subject: Camden Local Plan, Proposed Submission Draft 2025

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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="Joseph"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
(where relevant)	<input type="text"/>	<input type="text"/>
Organisation	<input type="text"/>	<input type="text"/>
(where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<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:** Joseph Davidson-Merritt

**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

Site C27

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

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

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

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

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

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

(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.

Site C27 changes should be abandoned due to the removal of vital green space in the area

(Continue on a separate sheet if necessary)

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

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

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

☒

No

☐

Yes

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

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

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

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

#### Privacy Notice

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

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

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

11. Signature:		Date:	27 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 14:22:51 +0000

From: Lily Burgering

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

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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,

Lily Burgering



Date: Fri, 27 Jun 2025 14:23:42 +0000

From: [redacted]

To: PlanningPolicy

Subject: Comment on Camden Local Plan Proposed Submission Draft

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

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

Dear Camden Planning,

I attach my comments on your Consultation on the latest draft of the  
Camden Local Plan Proposed Submission Draft Draft new Local Plan -  
Camden Council

These may be wholly or partly duplicated as part of Highgate Conservation Area Advisory Committee's submission on the same consultation. In that case, I apologise for some or all of these comments being sent twice. These are my personal comments.

(I am not quite sure whether some or all of these comments are likely to be included in the HCAAC submission or not, as we have all been overwhelmed by family, health and work priorities over recent weeks.)

Therese Gray

[redacted]

[redacted email]

Dear Camden Planners,

I include some comments on your Consultation on the latest draft of the Camden Local Plan Proposed Submission Draft [Draft new Local Plan - Camden Council](#)

These may be duplicated as part of Highgate Conservation Area Advisory Committee's submission on the same consultation. In that case, I apologise for sending these comments twice.

Chapter 4 - Central Camden; and  
Chapter 12 - Design and Heritage, 12.8 Tall Buildings", pp 453 - 458.

I challenge the assertion that the following sites are *"Locations where tall buildings may be an appropriate form of development"*:

F C2 Regis Road and Holmes Road Depot  
G C3 Murphy Site  
K C13 West Kentish Town Estate  
L C15 Wendling Estate and St Stephens Close  
N C23 Former Flats 121–129 Bacton, Haverstock Road

(see Figure 22 Tall Buildings on p 456 - reproduced below)

Views from Parliament Hill and Kenwood House on Hampstead Heath are protected in law. However, the view protected is not just a narrow sliver between tall buildings.

Both local and strategic views are also subject to Policies HC2, HC3 and HC4 of The London Plan (2021).

In particular:

### ***Policy HC3 Strategic and Local Views***

*A ...Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.*

*C ...These and other views are also subject to wider assessment beyond the Protected Vista.*

*F Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.*

*G Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of [Policy HC4 London View Management Framework](#) for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.*

*7.3.3 ... Wider Setting Consultation Area – the area enclosing the Landmark Viewing Corridor in the foreground, middle ground and background of the Protected Vista. Development above a threshold height in this area could compromise the viewer's ability to recognise and appreciate the Strategically-Important Landmark.*

*7.3.4 ... The SPG provides advice on the management of the foreground, middle ground and background of each view. ... Some views are experienced as a person moves through a viewing area and assessment of development proposals should consider this. The SPG provides guidance on the treatment of all parts of the view, and where appropriate the components of the Protected Vista for each view.*

Not only are the narrow sight lines from individual points in Camden to landmarks such as St Pauls protected, the wider panoramas from several points in Camden are also protected by the London Plan (2021):

**Table 7.1 - Designated Strategic Views**

**London Panoramas**

<b>Ref</b>	<b>View</b>
1	Alexandra Palace to Central London
2	<b>Parliament Hill to Central London</b>
3	<b>Kenwood to Central London</b>
4	<b>Primrose Hill to Central London</b>
5	Greenwich Park to Central London
6	Blackheath Point to Central London

The protections to views and vistas afforded by The London Plan (2021) and other legislation should apply to all the locations included in “*Table 12 | Locations where tall buildings may be an appropriate form of development*” (p457).

The “*Infrastructure Requirements*” sections in each Site Allocation in “*Chapter 4 - Central Camden*” should reflect the above protection of views of Central London from Kenwood and Parliament Hill.

In particular, the Site Allocations for the following sites should include in their Infrastructure Requirements that the “*Development must...*” comply with Policies HC2, HC3 and HC4 of The London Plan (2021) and any other relevant laws, regulations and policies which protect views to Central London from damage by excessively tall, massive or unsightly and inappropriate developments.

Table 12 | Locations where tall buildings may be an appropriate form of development

F C2 Regis Road and Holmes Road Depot

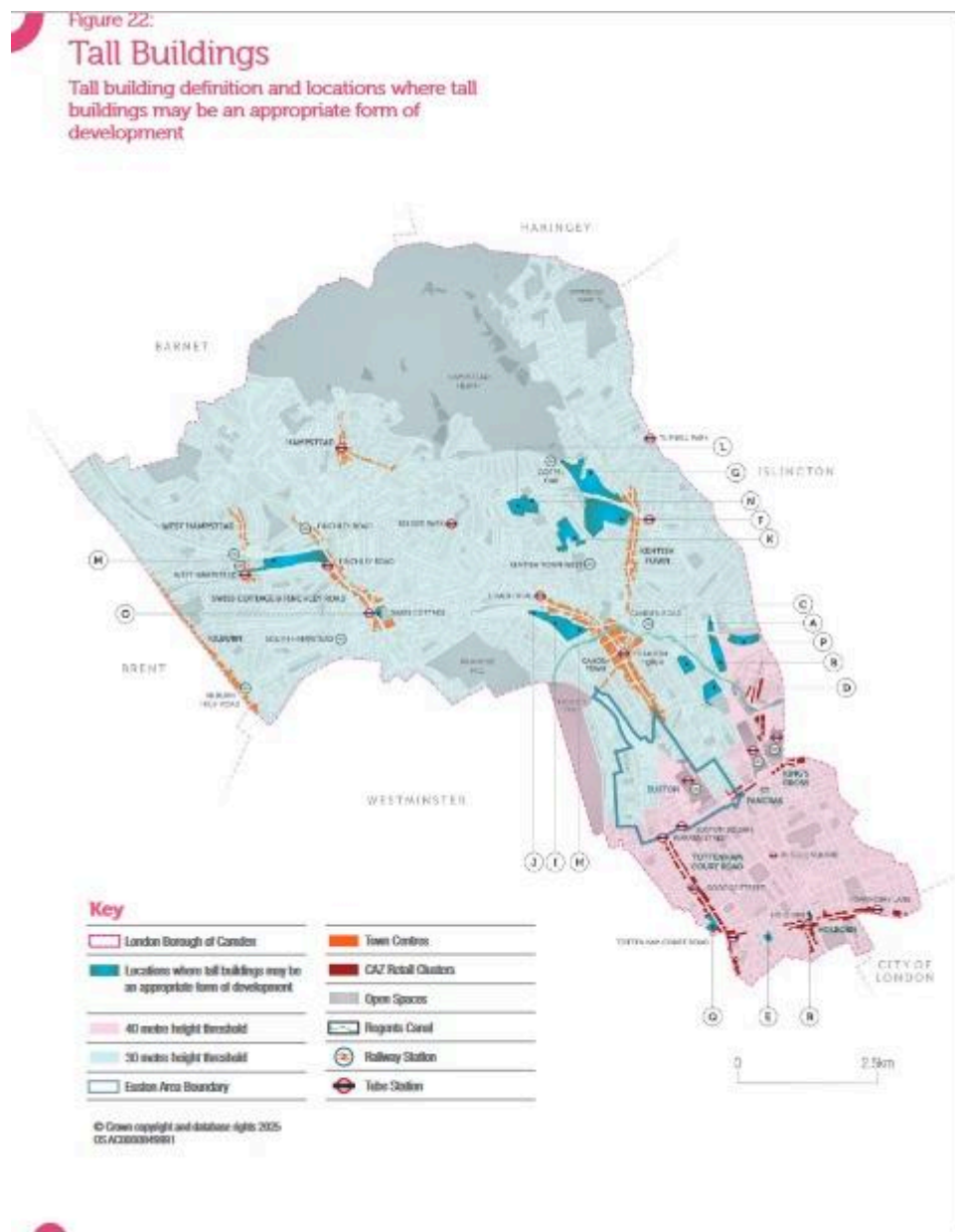
G C3 Murphy Site

K C13 West Kentish Town Estate

L C15 Wendling Estate and St Stephens Close

N C23 Former Flats 121–129 Bacton, Haverstock Road

Figure 22 Tall Buildings on p 456 of the [Draft new Local Plan - Camden Council](#)



I would therefore contend that these sites are not in fact suitable for tall buildings.

I would not wish to see any part of Camden subject to the kind of “mini-Manhattan”s which have sprung up in Acton, Lewisham, Hackney Downs and in many other places in London over recent years.

The Camden Local Plan should focus on the needs of people who live and work in Camden, providing livable homes and work spaces at a human scale, not the profits of developers, speculators and investors.

Therese Gray

Responder 575

Date: Fri, 27 Jun 2025 14:25:08 +0000

From: Forward Planning

To: PlanningPolicy

Subject: LB Barnet's response to LB Camden's Duty to Cooperate letter and draft  
Local Plan (Regulation 19 consultation)

---

Dear whom it may concern,  
Thank you for writing to LB Barnet under Duty to Cooperate, and  
regarding LB Camden's draft Local Plan (Regulation 19  
Consultation).  
Please find LB Barnet's representations attached.  
Kind regards,  
**Shav Bugler**

[Redacted signature block]

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

Barnet Online: [Redacted]

[Redacted]

environment - do you really need to print this email?

***Please note that the comments are provisional and represent an informal view by an officer; the views contained within this email do not constitute an official determination, are not legally binding and do not bind the council to a particular course of action.***





Neeru Kareer

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

27<sup>th</sup> June 2025

New Local Plan,  
Planning Policy Team  
London Borough of Camden  
Camden Town Hall  
Judd Street  
London  
WC1H 8EQ

**Response to London Borough of Camden's request for assistance in meeting the accommodation needs of Gypsies and Travellers and identifying a five-year housing land supply**

Thank you for your letter dated 23<sup>rd</sup> May 2025 regarding the Duty to Co-operate on the emerging Camden Local Plan. The letter seeks to understand whether LB Barnet's are able to:

1. assist Camden in meeting the accommodation needs of Gypsies and Travellers; and
2. assist Camden in identifying a five-year housing land supply of deliverable sites at examination (with the first five years of the Plan period being from 2026/27 to 2030/31).

LB Barnet's response to both requests is detailed below.

**Assist in meeting the accommodation needs of Gypsies and Travellers**

The Council formally adopted the new Barnet Local Plan in March 2025, incorporating the Main Modifications, after the Inspectors Report found the Plan to be sound and legally compliant. The Plan is now part of the statutory development plan and guides future planning decisions.

Policy HOU06 (Gypsies, Travellers and Travelling Showpeople -GTTS) of Barnet's Local Plan identifies no objectively assessed need for pitches and plots for GGTS. This policy is informed by evidence in the West London Alliance GTTS Assessment published in October 2018. In that regard, no existing sites and yards with pitches for Gypsies, Travellers or plots for Travelling Showpeople have been identified in Barnet. Furthermore, the evidence identified no current or future need for additional pitches or plots for those falling within the Planning Policy for Traveller Sites [PPTS] planning definition and other households that have ceased to travel or are living in bricks and mortar. The Planning Inspectorate considered the evidence based to be robust to ensure policy HOU06 is sound, and in general conformity with the London Plan insofar as its approach to housing needed for the Traveller community.

Notwithstanding, the Council is committed to an early review of the Local Plan. Policy HOU06 is a strategic policy, and a review of this policy will be required to consider the most up to date evidence base set out in the publication of the upcoming London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA). It is understood that the upcoming GTANA will produce Barnet -specific accommodation needs figures for Barnet (for both future needs for brick-and-mortar homes, and for Pitches) up to 2032. The new GTANA will help inform Barnet's future requirement to plan on meeting the accommodation needs of the Traveller community.

The GLA appreciate that London Boroughs are progressing their Local Plans (including upcoming reviews on recently adopted Local Plans) while the new GTANA is being produced. Given the Barnet's has no identify sites for pitches at this time, and the likely requirement to provide in the future following the imminent publication of the GTANA, Barnet are unfortunately not in a position to currently assist Camden in meeting the accommodation needs of Gypsies and Travellers.

### **Assist Camden in identifying a five-year housing**

The National Planning Policy Framework (2024) (Paragraph 78) requires local planning authorities to apply an additional buffer of 5% or 20% to ensure choice and competition, or where there has been a significant under delivery of housing. The 5 Year Housing Land Supply calculation considers the shortfall in delivery since the beginning of the London Plan period (2019) and includes a 5% buffer only.

Barnet adopted Local Plan seeks to deliver between 2021 and 2036 a minimum of 35,460 new homes, including the provision of affordable housing, as detailed with policy BSS01 (Spatial Strategy for Barnet) within the new Local Plan. This equates to delivering a challenging target of 2,364 new homes per annum, representing the 4<sup>th</sup> highest housing target across London. Considering the preparation of the new London Plan alongside a new London-wide housing target of 88,000 homes per year to be found, it is premature at this stage to know how this target will be distributed. On this basis, LB Barnet is unfortunately unable to assist Camden in identifying or accommodating its 5-year housing supply target at this time.

### **Moving forward**

Whilst many of the strategic matters and key issues, including the requirement to provide accommodation for Gypsy and Travellers, and setting new up to date housing targets will be addressed through the preparation of the upcoming London Plan for both boroughs, LB Barnet reiterates its ongoing commitment and look forward to working with LB Camden further on strategic matters that cross administrative boundaries.

Yours sincerely,

A black rectangular box used to redact the signature of Neeru Kareer.

**Neeru Kareer**  
**Assistant Director | Planning and Building Control**

Neeru Kareer

[Redacted signature block]

27<sup>th</sup> June 2025

New Local Plan,  
Planning Policy Team  
London Borough of Camden  
Camden Town Hall  
Judd Street  
London  
WC1H 8EQ

### **Response to London Borough of Camden's Local Plan – Regulation 19**

London Borough of Barnet (LB Barnet) has the following comments in respect of Camden's Regulation 19 Local Plan.

#### **Barnet's Local Plan**

The new Local Plan was adopted in March 2025 and establishes the Council's vision for growth and development in Barnet over a 15-year period (2021-2036).

#### **Spatial strategy**

LB Barnet supports Camden's spatial strategy to "*deliver a minimum of 11,550 additional homes over the plan period to 2041*" and welcomes the intention to meet the housing needs of existing and new communities, including appropriate levels of affordable housing and provision for other specific groups at sustainable locations together with the required supporting infrastructure, as detailed in Chapter 2 (Development Strategy).

The Plan highlights the "imminent review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target that is in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027/28, so this may mean that Camden's new Local Plan housing target is only in place for a short period of time". This is welcomed and will also be applicable to

#### **Barnet's early-stage review of our Local Plan.**

LB Barnet supports the provision of 406,359 sqm of net additional office floorspace (use classes E(g)(i) and E(g)(ii)) by 2041, to meet the Boroughs identified employment needs, which will be delivered from existing planning permissions; site allocations, and windfall development, also detailed in Chapter 2 (Development Strategy).

## **Transport impact, including a review of the proposed Site Allocations**

Barnet seek confirmation on whether the cumulative impacts of Camden's proposed site allocations for residential and employment development and Barnet's site allocations (particularly those closed to the shared administrative boundary) as set out within the new Local Plan have been collectively considered to establish whether the additional traffic flows modelled would cause undue concern at this stage, to Barnet's highway and existing transport Infrastructure. Appropriate mitigation measure and sources of funding required for mitigation has been thoroughly considered and/or already secured. Policies S1 (South Camden), C1 (Central Camden), W1 (West Camden) and N1 (North Camden) set out transport infrastructure priorities for those areas and further priorities are set out in the Council's Infrastructure Delivery Plan. Notwithstanding, it would be useful to set out Camden's overriding key infrastructure priorities across the Borough in a general Transport policy – either in policy T3 (Public Transport) or policy T4 (Shared Transport Infrastructure and Services).

It would also be helpful to understand what elements (where applicable) of policies T1, T2, T3 and/or T4 require cross-boundary working with neighbouring boroughs, particularly where there are references to 'strategic' and 'local' networks.

With reference to car parking, LB Camden should take account of LB Barnet's policy on parking in areas with shared boundaries with both Boroughs. (Barnet's standards are set out in Table 20 of Policy TRC03 as set out in the Local Plan.

It would be beneficial for policy W1 (West Camden) to refer to working jointly with LB Barnet and LB Brent on the A5 corridor to ensure consistent approaches to highway space allocation for bus priority and active travel and wayfinding.

## **Tall Buildings**

There are no sites identified as potentially suitable for tall buildings in the Camden's Reg 19 Local Plan close to the border with Barnet

Camden's Plan is clear that housing delivery is the priority land use of the Plan, in accordance with the London Plan's strategic position. Barnet's is mindful that Camden's need to deliver housing to meet its 5-year housing supply targets could compete with the need to proposals to "consider" local views when assessing to suitability for tall buildings in many of the site allocation sites.

## **Euston Masterplan**

The Euston Area Plan sets out the policy approach to tall buildings in the designated Euston area and identifies locations where tall buildings may be an appropriate form of development. Applications for tall buildings within the boundary of the Euston Area Plan should therefore also have regard to the Euston Area Plan.

LB Barnet would welcome being consulted on any future proposals, including strategic planning applications within the Euston Plan area, so as best to understand any impacts the proposals will have on LB Barnet, namely any "knock on" and cumulative impacts developments may have on Barnet's highways and public transport infrastructure.

## Site Allocations

There are three proposed site allocations which are relatively close to the Boundary with Barnet. These are as follows:

- Site allocation number: W7 Site location address: Gondar Gardens Reservoir
- Site allocation number: W13 Site location address: 551-557 Finchley Road
- Site allocation number: W14 Site location address: 317 Finchley Road

### Policy W7 – Site allocation for Gondar Gardens Reservoir

The site (1.24 hectares) allocation use is for permanent self-contained homes and/or specialist care home, with indicative housing capacity for 30 “additional” homes. The allocation states that *“Development must be designed to protect views across the site from harm or loss, in particular, the view to the east towards Hampstead”*. LB Camden is a position to weight any harm associated with a taller building onsite against its priority to deliver housing to meet its housing targets.

Within the “Development and Design Principles” section of the allocation, it would be useful to acknowledge that potential impacts on neighbouring boroughs’ highway and transport networks should be considered in the assessment of a future planning application(s). 30 additional homes onsite would unlikely give rise to issues on Barnet’s highways network. Notwithstanding, LB Barnet would welcome being consulted on any future planning proposal onsite, so as best to understand any impacts the proposals will have on LB Barnet in due course.

### W13 551-557 Finchley Road

The site allocation is for permanent self-contained homes and flexible commercial uses, with an indicative residential capacity for 15 homes. Planning permission was granted in November 2020 a mixed-use scheme of residential and flexible commercial uses in November 2020. It is not stated whether this planning consent has been implemented onsite. This should be clarified in table 7 of the draft Local Plan. Notwithstanding, the allocation should not present an undue impact of concern for LB Barnet, noting that this part of Finchley Road is on the Transport for London network.

### W14 317 Finchley Road

The site allocation is for a permanent self-contained homes and flexible commercial uses, with an indicative residential capacity for 22 homes. Planning permission was granted in June 2016 for a mixed-use scheme including permanent self-contained homes and flexible commercial uses to ground and lower floors. Given allocation states that “the scheme is under construction”. Barnet is therefore unclear as to whether its continued proposed site allocation status is either feasible or necessary, particularly if the scheme is at an advanced stage of construction.

## Moving forward

Many of the strategic matters and key issues shared with both Boroughs will be further addressed through the preparation of the next London Plan.

The issues set out above are broadly the key strategic matters regarding ongoing plan-making relevant to the London Boroughs of Camden and Barnet. Barnet are also mindful there are other issues that have cross-boundary impacts, including Gypsy and Traveller accommodation which Barnet is responded to Camden separately.

We continue our commitment to further engagement and look forward to working with London Borough of Camden on strategic matters that cross administrative boundaries.

Yours sincerely,



**Neeru Kareer**  
**Assistant Director | Planning and Building Control**

Date: Fri, 27 Jun 2025 14:28:47 +0000

From: Gergely Madaras

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

Subject: Objection to Proposed Allocation of Site C27 for Traveller Accommodation

---

I am writing in connection with the proposed allocation of Site C27 for Gypsy and Traveller accommodation. As a resident of [redacted], I pass through this area daily with my small children on our way to school, and am therefore familiar with the site's current use, its surrounding environment, and the constraints it presents.

I would like to formally register my objection to the proposed designation of Site C27, for the following reasons:

**1. Inadequate size and density of location**

This is a compact and densely populated neighbourhood. The site is surrounded by residential buildings such as Constable House, Eton Hall, Eton Place, and Eton Rise, creating a tightly enclosed urban setting with limited open space. The small footprint and close proximity of these buildings mean the area lacks the openness generally suited to Traveller communities, which often value privacy, outdoor space, and a degree of autonomy that this site cannot accommodate.

Moreover, the site is directly overlooked by numerous flats and balconies, including those in Eton Hall, Constable House, Eton Place, and Eton Rise. This results in an unavoidable lack of privacy for both current residents and any future occupants of the site. Such conditions raise serious concerns about the quality of life and mutual respect for all involved.

**2. Known flood risk**

The site is prone to waterlogging and surface water accumulation following rainfall. According to Planning Practice Guidance, Traveller pitches are classified as "Highly Vulnerable Use" and should not be situated in areas with known flooding issues. This risk alone should disqualify Site C27 from consideration.

**3. Lack of appropriate vehicular access**

Access to the site is limited to narrow estate roads and pedestrian footpaths, which are unsuitable for caravans, larger vehicles, and emergency services. The absence of independent or adoptable vehicular access renders the site impractical and potentially unsafe for residential use of this nature.

**4. High levels of pedestrian traffic and congestion**

Situated near Chalk Farm underground station and within walking distance of Primrose Hill and the Roundhouse, the area experiences very high pedestrian and touristic traffic-especially during weekends and events. Introducing residential use into this already saturated zone would place additional strain on local infrastructure and services, increasing congestion and potentially affecting community cohesion.

## **5. Loss of a valued communal space for recreation and sports**

Although the site is concreted, it has for many years served as a valued communal space under the “Communi-trees” initiative. It is frequently used by local families, particularly residents of Constable House, for informal play and social gatherings. Its removal would significantly impact the community-especially children and elderly residents-by eliminating one of the few accessible areas available for recreation and sport in this densely developed part of the borough.

## **6. Impact on the character and long-term stability of the neighbourhood**

As a resident contributing a substantial amount-approximately £4,000 per month-to live in this area, I chose this neighbourhood due to its reputation as a safe, well-connected, and family-friendly environment, offering proximity to excellent schools, reliable public transport, and high-quality local amenities. Many others in similar circumstances have made the same decision based on these attributes.

There is a genuine concern that introducing a use of this nature into such a densely populated and high-value residential zone may alter the perceived character and stability of the area. While this is not a comment on any community personally, the reality is that some residents, particularly those who moved here for its current environment, may reconsider their long-term commitment to the neighbourhood. The cumulative effect could impact the social and economic fabric that supports the area’s reputation and ongoing investment.

## **7. Addressing local security concerns**

This corner has lately become increasingly known for incidents related to illicit activities, including drug trade, particularly in the past year. The rise in such activity has raised concerns about the overall safety and security of the area. Introducing a residential site with new occupants and caravans could inadvertently exacerbate these challenges and strain local resources.

Instead of adding a new development that could contribute to existing security issues, I believe a more constructive approach would be to focus on enhancing the security measures for this area. Strengthening local patrols, increasing surveillance, and improving community safety efforts would better address the growing concerns and help preserve the neighbourhood’s integrity.



In conclusion, while I strongly support inclusive policies and the fair provision of accommodation for all communities, I do not believe Site C27 is an appropriate location for Traveller pitches. The site's limited size, unsuitable setting, lack of access, flood risks, and intense public exposure all indicate its fundamental unsuitability for such a purpose-both for current residents and for any future occupants.

Thank you for considering these concerns. I trust that local perspectives will be given due weight in your decision-making process, and I look forward to hearing from you in due course.

Kind regards,

**Gergely Madaras**

[redacted]

[redacted postcode]

Date: Fri, 27 Jun 2025 14:28:57 +0000

From: Sonia Slater

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

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

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PERSONAL DETAILS

Name: [ Sonia Slater ]

[REDACTED]

[REDACTED]

Email address: [[redacted email] ]

Dear Camden Council Policy Planning Team:

- Site C27 Fails Multiple Policy Tests according to Camden's Local Plan, the London Plan, and the Government's Planning Policy for Traveller Sites. These include: Camden Policy H10, PPTS Policy H - Environmental Suitability, Camden Policy H10 - Safe access, Camden Policy H10 - Loss/protection of open and community space, Camden Policy H10, PPTS Policy H - Incompatibility with surrounding uses, PPTS Policy B & H, London Plan H14 - Lack of privacy and tranquillity

- Loss of privacy for residents/future occupants: The site is directly overlooked by numerous residential buildings, including Constable House (4-5 storeys), the Etons (6 storeys), Provost Road houses, Primrose House, Bridge House, and the new block on Haverstock Hill. The location offers no seclusion or quiet. Any families placed here would live in full view of hundreds of windows, next to a busy road, a railway line, and a major pedestrian route. It would not provide a safe, private or dignified living space.

- Loss of green space: This is one of the last small green areas in our immediate neighbourhood. Its removal would take away a calm, natural space in an already built-up and densely populated environment.

- Community planting: Over the last few months, fruit trees and wildflowers were planted here as part of the Communities project, supported by local young people. The proposed site would wipe out this initiative entirely, which feels like a step backwards for community life and local engagement.

- Playground space: The site is used by children from Constable House and neighbouring homes as an informal but essential play area. Removing this space would take away one of the few places where local children can safely play outdoors.

- Flooding history: The area has recently experienced repeated flooding, especially around the play area. Developing this ground would risk further complications for both the site and surrounding buildings.

- No clear planning for school places: There is no information indicating whether any consideration has been given to nearby school capacity or access to essential local services.

- No Consultation: The allocation of Site C27 was not disclosed during earlier consultation rounds and our community only found out about the shortlist a week ago, undermining effective participation. This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and suggests procedural unfairness.

#### Conclusion

I urge the Council to rethink this site allocation. Site C27 is too small, too exposed, too noisy, and too important to the local community in its current use. There are better, safer, and more respectful options to be considered. I urge Camden Council to work to identify more suitable alternatives that prioritise safety, dignity, and real community integration.

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

Thank you for your time and consideration,

Sonia Slater

Date: Fri, 27 Jun 2025 14:28:37 +0000

From: Alex Labridis

To: PlanningPolicy

Subject: Camden Local Plan – Proposed Submission Draft 2025

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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.

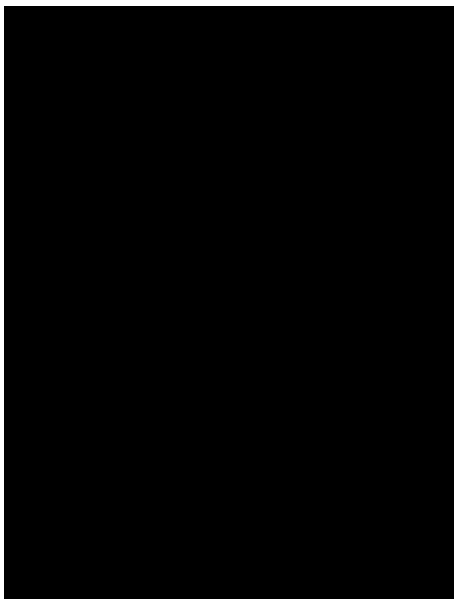
Before completing this representation form please refer to the attached guidance notes.

### 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="Alex"/>	<input type="text"/>
Last Name	<input type="text" value="Labridis"/>	<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: OWN LONDON PROJECTS 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	D6
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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	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 the support given in the ASUC representation regarding Policy D6 Basements

I would like to add that our company employs [INSERT NUMBER OF PEOPLE WHO WORK FOR YOUR COMPANY INCLUDING LABOUR ONLY SUBCONTRACTORS] 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](#).

<b>11. Signature:</b>	<i>Alex Labridis</i>	<b>Date:</b>	<b>26<sup>th</sup> June 2025</b>
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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 14:31:24 +0000

From: Louisa Smith

To: PlanningPolicy

Subject: Camden Local Plan Proposed Submission Draft | YC CFQ Ltd

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[redacted]  
[redacted] edacted email]

This e-mail is intended solely for the person to whom it is addressed. It may contain confidential or privileged information. If you have received it in error, please notify the sender immediately and destroy the transmission. You must not copy, distribute or take any action in reliance on it.

BEWARE OF CYBER-CRIME: Our banking details will not change during the course of a transaction. Should you receive a notification which advises a change in our bank account details, it may be fraudulent and you should notify Montagu Evans who will advise you accordingly.

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

Dear Sir / Madam

We write on behalf of our Client, YC CFQ Limited an affiliate of Yoo Capital Management, to formally submit representations to the London Borough of Camden ('LBC') consultation on the Regulation 19 Proposed Submission Draft of the New Local Plan.

YC CFQ Ltd is a key stakeholder in LBC, having acquired the former Saville Theatre on Shaftesbury Avenue in 2021 and the Holmes Road Depot and Regis Road Recycling Centre in Kentish Town (on a subject to planning basis) in 2023. YC CFQ Ltd also acquired other land parcels in 2024 within the Regis Road Growth Area (on a subject to planning basis), including Regis Road.

YC CFQ Ltd's vision for the area, which includes a Camden Film Quarter, was the subject of a public consultation in 2023 and 2024, with YC CFQ Ltd subsequently submitting a Masterplan Vision to LBC for review. LBC adopted the Regis Road Area Guidance Supplementary Planning Document (SPD) on Monday 10 March 2025. This is adopted as an SPD to Camden's Local Plan (2017) and an addendum to the Kentish Town Planning Framework (KTPF) (2020).

YC CFQ Ltd 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

Aligned with LBC, YC CFQ Limited strategic objective is to ensure that the Holmes Road Depot and Regis Road Recycling Centre act as a catalyst for the wider regeneration of the Kentish Town Planning Framework area. YC CFQ Ltd is working with LBC and local stakeholders to deliver a new creative centre for Kentish Town, providing much needed new homes and jobs, whilst also creating and fostering a safe, accessible, healthy and vibrant neighbourhood.

YC CFQ Ltd 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:

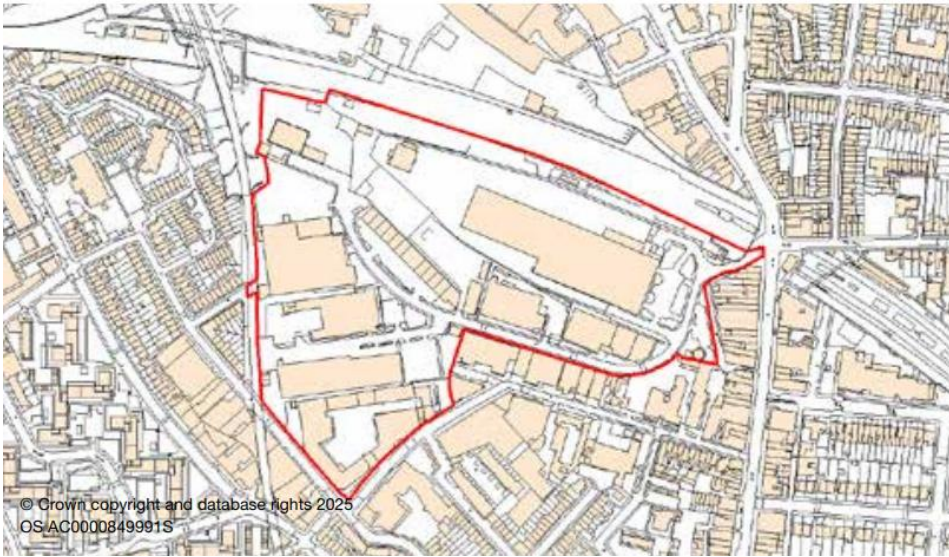
- Ensuring that development in LBC responds to the climate emergency;
- Increasing the supply of homes within the Borough, with an emphasis on genuinely affordable homes;
- Ensuring development meets the needs of LBC's diverse communities'
- Strengthening LBC's nationally important economy;
- Ensuring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

## Draft Policies upon which Representations are Submitted

These representations begin by focusing on the Site Allocations for the Regis Road and Holmes Road Depot Site, the Kentish Town Police Station, and the York Way Depot and adjacent land at Freight Lane. They then comment on some of the more general policies.

### 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>	It is requested that the allocated uses reflect the potential for creative and knowledge industries to be delivered in this location, as indicated in the development and design principles. The creative industries account for a significant amount of employment in the Kentish Town area and such uses establishing locally would be a clear opportunity to maximise local employment and economic benefit.
<b>Indicative Capacity</b>	1,000 additional self-contained homes
<b>Indicative Capacity Representation</b>	YC CFQ Ltd is supportive of the ambition to deliver approximately 1,000 additional homes on the site. It is requested that policy allows for further increased housing capacity, where appropriate and justified in planning terms.
<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>Background Representation</b>	<p>The principle of development proposals being progressed through a comprehensive masterplan process, informed by the Kentish Town Planning Framework and the Regis Road Area Guidance, is supported.</p> <p>YC CFQ Ltd agree with the assertion that the site is currently underused and that there is a significant opportunity for intensification through mixed use development. We would request the potential to contribute to creative and knowledge industries, alongside housing and other uses, is included within the policy wording.</p>

	<p>We support the principle of using Regis Road and Holmes Road as an enabler and catalyst for regeneration of the wider Kentish Town Planning Framework area. This is in line with YC CFQ Ltd's ambition for the site.</p> <p>It is agreed that the reprovision of the Recycling Centre and other Council services should be reprovided, however, this should be subject to assessment of their need and possible reprovision in other locations.</p>
<b>Development and Design Principles</b>	<p>Development must:</p> <ol style="list-style-type: none"> <li>1. 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>2. 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>3. intensify industrial and other employment uses through efficient design that enables co-location with housing and other proposed uses;</li> <li>4. ensure that non-employment uses do not compromise the operation of employment uses;</li> <li>5. 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>6. 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> <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 reprovision 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</li> </ol>




	<p>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;</p> <p>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);</p> <p>14. provide a new public square as a focus for the area and community activity;</p> <p>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);</p> <p>16. include the provision of free, publicly accessible toilets suitable for a range of users, including changing places toilets, and free drinking water;</p> <p>17. create new and enhance existing areas of biodiversity across the site;</p> <p>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;</p> <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>YC CFQ Ltd is supportive of the development and design led principles set out within the draft Site Allocation.</p> <p>YC CFQ Ltd is supportive of the ambition to reprovide and deliver new housing in line with the draft site allocation, as set out in 9 and 10.</p>



	<p>YC CFQ Ltd is supportive of the ambition to improve connections to, and within the site, providing safe and attractive pedestrian and cycle routes. In addition, YC CFQ Ltd is supportive of the ambitions for biodiversity enhancements across the site.</p> <p>YC CFQ Ltd 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 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>In terms of the re-provision of the Regis Road Recycling Centre, YC CFQ Ltd agrees that the continuous availability of required services is important. The need for re-provision should be suitably assessed and this assessment is included within the policy wording.</p>

	<p>Currently, part 23 notes that “re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site”, it is requested that this is amended to state:</p> <p><b>“re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site, subject to assessment of current and future requirements”.</b></p> <p>This is to ensure that any future requirements for the Recycling Centre continue to be met, whilst also recognising the need to adapt to advancements in technology and behaviours.</p> <p>The wider contributions towards public transport, pedestrian and cycling links are supported, subject to assessment of feasibility and demand.</p> <p>YC CFQ Ltd is keen to work with LBC to support the local approach to decarbonisation.</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>

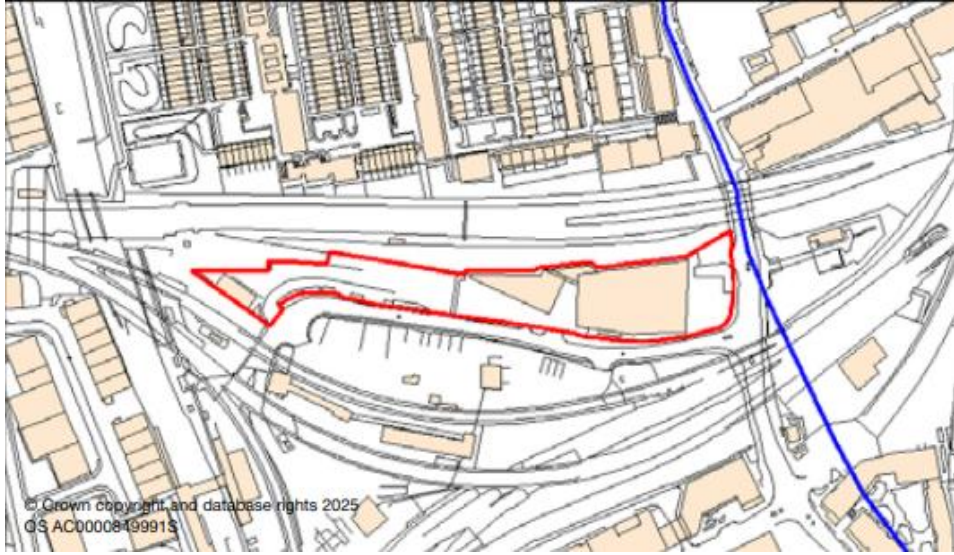
Draft Site Allocation Police C4 – Kentish Town Police Station

<b>Site Plan</b>	
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<b>Address</b>	Kentish Town Police Station, 10-12A Holmes Rd
<b>Area</b>	0.45 hectares
<b>Allocated Uses</b>	Police facilities; permanent self-contained homes and student accommodation
<b>Allocated Uses Representation</b>	<p>YC CFQ Ltd understand the Metropolitan Police Service is providing representations in respect of their own police functions on the site.</p> <p>YC CFQ Ltd support the provision of self-contained homes within the allocated uses. We would welcome the inclusion of the site as an appropriate location for the replacement recycling centre, as alternative locations continue to be explored.</p> <p>It is requested that the allocated uses also reflect the potential for a range of uses to be delivered within the listed police station, as indicated in the development and design principles.</p>
<b>Indicative Capacity</b>	35 additional self-contained homes
<b>Indicative Capacity Representation</b>	YC CFQ Ltd is supportive of the ambition to deliver 35 additional homes on the site. It is requested that that residential capacity is described as 'up to' 35 units subject to testing and potential benefits of accommodating the recycling centre as a mixed-use approach.
<b>Description of Existing Site</b>	This site contains a listed Victorian police station (Station House), with a more modern annex building attached, and an eight storey police Section House. It also includes a yard, vehicle parking and some small-scale structures. The site fronts on to Holmes Road but has vehicular access to Regis Road at the rear.
<b>Context</b>	<ul style="list-style-type: none"> <li>The Metropolitan Police Service intend to retain the police use of the station and annex to meet operational requirements but there is potential to make more efficient use of parts of the site, such as the yard / parking space and the Section House. The Council would support the site being taken forward as part of the development of Regis Road (Policy C3) if this enables a better solution to be found to meet the operational needs of the Metropolitan Police Service and support the delivery of the Regis Road masterplan.</li> </ul>
<b>Development and Design Principles</b>	<p>Development must:</p> <ol style="list-style-type: none"> <li>1. provide for continued police facilities on this site, either alone, or part of, a mixed-use development of the site, comprising police facilities and permanent self-contained homes. Community uses and small-scale employment uses may also be suitable here;</li> <li>2. ensure that the introduction of other uses on the site does not compromise police operational requirements;</li> <li>3. preserve the listed police Station House building and not harm its setting, in accordance with Policy D5 (Historic Environment);</li> <li>4. seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings) and re-use to provide student accommodation. Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);</li> <li>5. optimise the delivery of permanent self-contained homes in accordance with Policy H1 (Maximising Housing Supply);</li> <li>6. be designed to address both Holmes Road and Regis Road;</li> <li>7. seek to provide a safe and attractive walking, wheeling and cycling route between Holmes Road and Regis Road to improve connections with surrounding communities; and</li> </ol>

	8. be designed to ensure that the main vehicular entrance to the site is from Regis Road in order to accommodate the Council's wider aspirations for the Holmes Road area.
<b>Development and Design Principles Representation</b>	<p>YC CFQ Ltd is supportive of the development and design led principles set out within the draft Site Allocation.</p> <p>As noted above, it is requested that the allocated uses also reflect the potential for a range of uses to be delivered within the listed police station, as indicated in the development and design principles.</p> <p>In respect of 4, student accommodation. It is understood that this land use would only be considered where Section House does not remain in its existing use as a police station.</p>
<b>Other Considerations</b>	<ul style="list-style-type: none"> <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> </ul>

Draft Site Allocation Policy S20 – York Way Depot and adjacent land at Freight Lane

<b>Site Plan</b>	
<b>Address</b>	York Way Depot and adjacent land at Freight Lane
<b>Area</b>	1.05 ha
<b>Allocated Uses</b>	Permanent self-contained homes, employment (including offices), depot and bus operation s/ parking facility and accommodation for gypsies and travellers
<b>Allocated Uses Representation</b>	YC CFQ Ltd is supportive of the allocated uses, recognising that LBC are considering the co-location and intensification of Council depot facilities on this site.
<b>Indicative Capacity</b>	210 additional homes

<b>Description of Existing Site</b>	The site includes a Council depot with offices, sui generis depot facilities (primarily vehicle parking and maintenance), and largely open land, which was last used for bus parking with ancillary staff facilities. It is bordered to the north by railway lines, by York Way to the east, and a concrete plant to the south, which is a safeguarded aggregate site.
<b>Context</b>	The site is part of former railway lands redeveloped under the Channel Tunnel Rail Link (CTRL) project and related 1996 Act.
<b>Development and Design Principles</b>	<p>Development must:</p> <ol style="list-style-type: none"> <li>1. intensify the employment floorspace on the site, with no net loss;</li> <li>2. optimise the use of the site through efficient design, to enable the co-location of housing, employment, gypsy and traveller accommodation and other proposed uses, whilst ensuring that the introduction of non-employment uses does not compromise the operation of employment uses;</li> <li>3. optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area proposed;</li> <li>4. provide accommodation for gypsies and travellers in accordance with H11 (Accommodation for Travellers);</li> <li>5. ensure that the intensification of employment uses provides high-quality, modern, flexible employment spaces, and significantly increases the number of jobs on the site. The provision of affordable workspace will also be expected;</li> <li>6. ensure that the design and layout of the scheme mitigates the impact of, and protects occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the Agent of Change principle and incorporates mitigation measures where necessary in accordance with Policy A1 (Protecting Amenity);</li> <li>7. create a more active and engaging street frontage addressing York Way;</li> <li>8. provide substantial new, welcoming, accessible and safe open space and public areas;</li> <li>9. seek to improve conditions for pedestrians and cyclists along Freight Lane;</li> <li>10. enhance the 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;</li> <li>11. ensure that proposals for the redevelopment of this site appropriately consider their impact on the railway and its operations; and</li> <li>12. be designed and located so as not to prejudice the continued operation of the aggregates transshipment facility which straddles the railway immediately south of this site.</li> </ol> <p>The Camden Building Height Study identified this site as a location where tall buildings may be an appropriate form of development, with 15m – 56m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their</p>



	<p>location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.</p> <p>13. retain or reprovide the Council Depot 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;</p> <p>14. protect bus depot capacity as necessary; and</p> <p>15. contribute towards the delivery of the Camden High Line.</p>
<b>Development and Design Principles Representation</b>	<p>YC CFQ Ltd is supportive of the development and design led principles set out within the draft Site Allocation, providing that the allocated uses do not preclude the potential intensification of depot uses on the site. It is understood that the potential relocation of the Holmes Road depot facilities onto this site is being considered. As such, this should be allowed for within the policy wording.</p>
<b>Other Considerations</b>	<ul style="list-style-type: none"> <li>Part of the site is within two viewing corridors set out 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>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>This site is within the Secondary A Aquifer. Should foundation works extend 20m or more below the ground surface, there is a risk they will extend through the London Clay and affect sensitive aquifers. Therefore, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.</li> </ul>

#### Draft Policy H4 Maximising the supply of Affordable Housing

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

<b>Policy H4 Maximising the supply of Affordable Housing</b>	<p>A. The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable. The Council will aim to maximise the supply of affordable housing, meet or exceed a borough wide strategic target of 3,000 additional affordable homes from 2026/27 - 2040/41, and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.</p> <p>B. We will expect a contribution to affordable housing from all major developments involving housing, and non-major developments that provide one or more additional homes and involve a total addition to housing floorspace of 100 sqm GIA or more. The Council will seek to negotiate the contribution to affordable housing on the following basis:</p>
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	<ol style="list-style-type: none"> <li>1. distinctive criteria will apply to smaller developments considered to have capacity for 15 or fewer additional homes, and larger developments considered to have capacity for 16 or more additional homes;</li> <li>2. development capacity will be assessed on the basis that 100sqm (GIA) of housing floorspace creates capacity for 1 home;</li> <li>3. in assessing development capacity, the additional housing floorspace will be rounded to the nearest 100 sqm (GIA);</li> <li>4. in the case of smaller developments, a sliding scale target will apply, starting at 2% for developments with capacity for one additional home and increasing by 2% for each home added to the capacity (reaching an affordable housing target of 30% for developments with capacity for 15 additional homes);</li> <li>5. in the case of larger developments, the London Plan's strategic affordable housing target of 50% will apply, but will be subject to the London Plan's viability threshold approach;</li> <li>6. in all cases, we will apply a guideline mix of affordable housing types to seek 60% low-cost rented housing and 40% intermediate housing;</li> <li>7. in all cases, we will assess the percentage of affordable housing and of each affordable housing type (usually low-cost rented housing and intermediate housing) on the basis of both the proposed housing floorspace and the proposed number of habitable rooms;</li> <li>8. for the largest developments involving housing (typically those providing 100 homes or more), the Council may seek affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision;</li> <li>9. the affordable housing sought should be provided on site wherever practical, particularly in the case of larger developments;</li> <li>10. where affordable housing cannot practically be provided on site, or off site provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing off site in the same area, or exceptionally a payment-in-lieu; and</li> <li>11. in the case of estate regeneration proposals, the distinctive affordable housing provisions for this type of development in Policy H5 and the London Plan will apply.</li> </ol> <p>C. We will seek to ensure that where development sites are split, additional proposals are brought forward on the same site, or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for all the proposals together. The Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution.</p> <p>D. Where a development of build to rent housing, purpose-built student accommodation, or large-scale purpose-built shared living is proposed, we will apply the distinctive affordable housing provisions of the London Plan for the relevant housing type, but as an alternative will strongly encourage contributions of self-contained affordable housing on these development sites in accordance with the guideline mix set out in criterion 6 of Part B above where feasible, having regard to whether developments are able to include separate blocks and/ or stair/ lift cores.</p>
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	<p>E. In considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:</p> <ol style="list-style-type: none"> <li>1. any existing housing on site, including market housing and affordable housing, the provisions for protection of existing housing and estate regeneration proposals in Policies H3 and H5, and the impact that the existing housing has on the financial viability of the development;</li> <li>2. any self-build or custom-build housing proposed, and whether this housing is consistent with the objective of Policy H1 to optimise the homes delivered on each site;</li> <li>3. any housing proposed for people with care or support requirements (notably specialist older persons housing), the objectives of Policy H8, and any relevant provisions of the London Plan;</li> <li>4. the character and size of the development, and any constraints on developing the site for a mix of housing including market and affordable housing or the particular types of affordable provision sought;</li> <li>5. the impact on creation of mixed, inclusive and sustainable communities;</li> <li>6. the impact of the mix of housing types sought on the efficiency and overall quantum of development;</li> <li>7. 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 build to rent housing, and any recommendations of an independent viability assessor commissioned to advise the Council; and</li> <li>8. whether an alternative approach could better meet the objectives of this policy and the Local Plan.</li> </ol> <p>F. Having regard to the London Plan, where a development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to delivery, the Council will seek early, mid-term and / or late stage viability reviews to determine the maximum contribution to affordable housing deliverable by the development.</p>
<b>Policy H4 Representation</b>	<p>As previously noted, YC CFQ Ltd is supportive of LBCs ambition to deliver approximately 1,000 additional homes within the C2 site allocation area. YC CFQ Ltd supports draft Policy H4 of the Draft New Camden Local Plan which reflects the London Plan's strategy target for 50% of London's new homes to be genuinely affordable.</p>

#### Draft Policy IE3 Industry

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

<b>Policy IE3 Industry</b>	<p>A. The Council will manage and protect the supply of industrial and warehousing land, recognising its value for a variety of business types, while recognising the opportunities for some sites to be used more efficiently to deliver economic and wider Local Plan objectives.</p>
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	<p>B. We will resist the loss of industrial and warehousing land, particularly where it has an important local economic role, or provides essential functions or services for the Central Activities Zone, unless it can be demonstrated to the Council's satisfaction that:</p> <ol style="list-style-type: none"> <li>1. the site is no longer able to support a similar or alternative industrial use; and</li> <li>2. a marketing exercise has been undertaken which demonstrates there is no demand for an industrial-related use; and</li> <li>3. the applicant has explored options for the refurbishment and modernisation of existing premises. The Council will expect viability evidence to be submitted, to demonstrate that it is not possible for the building to be refurbished.</li> </ol> <p>C. The site allocations in the Local Plan identify opportunities to intensify large industrial and warehousing sites in the borough. To fully realise the potential of such developments, applicants must have regard to:</p> <ol style="list-style-type: none"> <li>1. the need for these sites to be master planned and developed on a comprehensive basis with priority given to intensifying employment uses;</li> <li>2. the delivery of significant numbers of jobs for growth sectors, small and medium enterprises, start-ups and businesses supporting the Central Activities Zone and local supply chains;</li> <li>3. re-provision of a range of premises that takes into account the varied operational requirements of industrial businesses;</li> <li>4. prioritising the retention of existing businesses as far as possible. The Council may request the applicant to provide a business relocation strategy where it is not feasible to re-provide accommodation for businesses on-site;</li> <li>5. incorporating premises at a range of rents, including affordable workspace, and a package of employment and training contributions appropriate to the scale of the development;</li> <li>6. ensuring the successful co-location of uses through innovative design approaches and avoiding non-employment uses compromising the operation of businesses in line with the Agent of Change principle; and</li> <li>7. the need to complete the employment element of mixed-use schemes at an early stage in the construction programme.</li> </ol>
<b>Policy IE3 Representation</b>	<p>Part C) of this draft Policy has regard to where the Local Plan proposes the development of existing industrial and warehousing land. YC CFQ Ltd is supportive of the requirement for this to form part of a comprehensive and intensified employment-led approach and the applicable requirements, for example ensuring the successful co-location of uses through innovative design approaches.</p>

#### Draft Policy D2 Tall Buildings

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

<b>Policy D2 Tall Buildings</b>	<p>A. The Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured</p>
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	<p>from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift overruns), as shown on Figure 22.</p> <p>B. Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12. Guidance on building heights for specific sites is set out in relevant site allocation policies.</p> <p>C. The Council will assess proposals for buildings above the threshold heights set out in (A) above against the London Plan tall buildings policy and the design criteria in Policy D1 (Achieving Design Excellence). We will also give particular attention to:</p> <ol style="list-style-type: none"> <li>1. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, having regard to both the existing and the emerging context;</li> <li>2. the relationship between the building and neighbouring boroughs, where tall buildings are proposed close to the borough boundary;</li> <li>3. whether the proposal maximises energy efficiency and resource efficiency in accordance with Climate Change Policies CC3, CC4 and CC6;</li> <li>4. whether the development delivers the highest standards of sustainable design and construction in line with Policy D1 (Achieving Design Excellence);</li> <li>5. whether the proposal maximises the supply of affordable housing in accordance with Policy H4 (Affordable Housing);</li> <li>6. whether the proposal creates a safe and secure environment in accordance with Policy A2 (Safety and Security);</li> <li>7. whether the site is of a sufficient size to accommodate a tall building, without having a detrimental impact on existing buildings, public spaces and amenity;</li> <li>8. the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets in accordance with Policy D5 (Historic Environment);</li> <li>9. the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views;</li> <li>10. the contribution a building makes to pedestrian movement and experience, connectivity and improved public accessibility;</li> <li>11. the degree to which the building overshadows neighbouring buildings and spaces, especially public spaces, open spaces, watercourses and renewable energy infrastructure;</li> <li>12. the relationship between the building and other neighbouring tall buildings;</li> <li>13. the contribution the development makes to wider place making objectives and infrastructure delivery in line with Policies DS1 (Healthy and Sustainable Development), D1 (Achieving Design Excellence) and DM1 (Delivery and Monitoring);</li> <li>14. the quality of homes and amenities provided;</li> <li>15. the proposed internal and external illumination of the building. All tall building proposals will require a Lighting Strategy; and</li> <li>16. the impact on biodiversity, for example migratory routes and bird collisions, in accordance with Policy NE2 (Biodiversity).</li> </ol>
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<b>Policy D2 Representation</b>	YC CFQ Ltd welcomes the definition of the Kentish Town Planning Framework area as an area suitable for tall buildings. It is recognised that further guidance on specific heights is set out in the relevant site allocation policies.
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#### **Future Involvement in the Local Plan Process**

YC CFQ Ltd 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.

[Redacted signature block]

Yours faithfully,

*Montagu Evans*

Montagu Evans LLP

Responder 580

Date: Fri, 27 Jun 2025 14:33:49 +0000

From:

To: PlanningPolicy

Subject: CAMDEN LOCAL PLAN- PROPOSED SUBMISSION DRAFT

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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)	
<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>			
Title	<input type="text" value="MR"/>	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="TREVOR"/>	<input type="text"/>	<input type="text"/>
Last Name	<input type="text" value="VINCENT"/>	<input type="text"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>	<input type="text"/>
Organisation	<input type="text"/>	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<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](#)

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

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

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

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

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

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

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

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

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

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



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

I would like to add that our company employs [3] who work in the sector with annual turnover of £[250,000].

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

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

(Continue on a separate sheet if necessary)

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

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

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

(Continue on a separate sheet if necessary)

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

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

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

No

No

Yes

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

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

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

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

**Privacy Notice**

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

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

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

11. Signature:		Date:	26 <sup>th</sup> June 2025
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My name is Georgia Neville. I live at [redacted] and have lived here since 1999.

Last week I came across a local neighbourhood page discussing the plans below. I was heavily shocked and thought this must not be true due to no letters through the door nor any neighbours mentioning.

After going into absolute shock and physical shaking, I went around and double checked with neighbours to see if anyone had heard this news and non had - which I thought was the case as we are such a close estate, something that's taken many years to achieve! I through my years have seen many different stages at Constable house (I have lived here since I was years of age).

From OUTSIDE drug use and dealing, fights, my own mother's car being set alight, stabbings, Haverstock school teens bunking, random outsiders using our in block stairs to smoke drugs ALL from OUTSIDE NON TENANTS.

I can now safely say Constable house has become a safe, enjoyable estate to live in and wish for it to stay this way. I find this plan on SO many levels unfair for not some but ALL tenants and everyone who lives locally, as again I can confirm there has not been ONE person through the hundreds of people at meetings, WhatsApp groups etc that has said they think this is a good idea and I think this needs to be RECOGNISED!!!

Currently the gates of the idea in question are locked, many neighbours have said they would be happy to be in charge of opening and closing gates as and when needed.

We would love for it to be a safe place for the children of the estate to go as the play area currently is close to where cars park so it makes a lot of sense for the parents to take their children in there.

The area is surrounded by lovely greenery and with locals adding amazing work it's become even more green with amazing flowers and plants blossoming!!

This will not be the case if we have caravans and vans with waste load around - right now we have a very neat in and out system for our estate.

Also experiencing lots of foxes around and this will certainly add to the problem!

It's really been a joy and genuinely made such a difference to the feel of the estate having it the way it is now.

All the tenants wish to keep this area for our estate and I'm pretty sure if anyone knew the potential plans would want to either move or sell their properties as it's also extremely unfair to the people who have paid a lot of money to buy their flats/ are currently in the process of.

I hope these plans are really thought through and you take everyone's strong thoughts and worries into consideration.

Many thanks,  
Georgia Neville.

## **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**

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

**Footfall and exposure:** The plot is right next to Chalk Farm station and sits along the busy walking route to Primrose Hill, one of the most heavily used pedestrian corridors in the area. It's already a high-traffic zone, with very little calm or protection from noise and movement.

**Loss of privacy for residents/future occupants:** The site is directly overlooked by numerous residential buildings, including Constable House (4–5 storeys), the Etons (6 storeys), Provost Road houses, Primrose House, Bridge House, and the new block on Haverstock Hill. The location offers no seclusion or quiet. Any families placed here would live in full view of hundreds of windows.

**Loss of green space:** This is one of the last small green areas in our immediate neighbourhood. Its removal would take away a calm, natural space in an already built-up and densely populated environment.

**Community planting:** Over the last few months, fruit trees and wildflowers were planted here as part of the Community Trees project, supported by local young people. The proposed site would wipe out this initiative entirely, which feels like a step backwards for community life and local engagement.

**Playground space:** The site is used by children from Constable House and neighbouring homes as an informal but essential play area. There is no obvious alternative nearby. Removing this space would take away one of the few places where local children can safely play outdoors.

**Access issues:** The proposed access to the site would be directly opposite to buildings, raising serious concerns about traffic flow and disruption for both residents and any future occupants of the site.

**Flooding history:** The area has recently experienced repeated flooding, especially around the play area. Developing on this ground would risk further complications for both the site and surrounding buildings.

**No clear planning for school places:** There is no information indicating whether any consideration has been given to nearby school capacity or access to essential local services.

**No Consultation:** There has been no meaningful consultation with local residents regarding the proposed use of this site.

### **Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified by the deletion of site C27. I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Georgia Neville

Date: Fri, 27 Jun 2025 14:36:43 +0000  
From: Lai-Yee Pak  
To: PlanningPolicy  
Subject: Response to Draft Local Plan 2025

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I'm Lai-Yee Pak, resident of [redacted address], [redacted postcode] and I'm hereby sending you my feedback to your ongoing public consultation for Camden Local Plan 2025.

One key point I'm **strongly opposing to is the proposed relocation of the Regis Road Recycling Centre onto the parking lot of Kentish Town Police Station on Holmes Road**, as proposed in Regis Road Area Guidance SPD entitled « regis-road-area-guidance-spd\_final\_lowres\_1-1 » (page 47). This is not directly referred to in Camden Draft Local Plan but the impacted area is covered in the Local Plan Chapter 4 Central Camden, Allocation C2 Regis Road and Holmes Road Depot.

The reasons for my opposition are straightforward:

- This proposed site is immediately adjacent to homes & schools and near the Kentish Town High Street. Such relocation would materially **disrupt the quality of life of residents and negatively impact local businesses**.
- This would raise **serious public health concerns** with increased pollution, traffic congestion, noise and odours
- This relocation **contradicts Camden's stated objectives** for a vibrant, sustainable and community-oriented regeneration of Kentish Town
- **Reasonable alternatives for a different location** must be seriously assessed immediately. No reference to this proposed site into the Police Station's parking lot was provided in the Nov-24 SPD

In addition, the noise from sirens coming from the Police Station in the early mornings and evenings is highly disturbing the residents nearby. I'd suggest the council to consider a closed parking lot for the police to avoid disturbing the neighbours with siren at all times.

Hope the voice of our community will be heard and that we will hear back from the council in the next steps of the Recycling Centre issue. If there is any examination hearings, it is important to include the Local Community of Kentish Town.

With regards to notifications, I'd like to be notified when there is a revised Camden Local plan, when it's adopted and when the inspector's reports are published.

Best regards,  
Lai-Yee

Responder 583

Date: Fri, 27 Jun 2025 14:39:09 +0000

From: Ailish Collins

To: PlanningPolicy

Subject: Camden Local Plan Reg 19 - Shaftesbury Capital Representations

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Good afternoon,

On behalf of our client, Shaftesbury Capital PLC, please find enclosed representations on the Regulation 19 Consultation version of the Camden Local Plan.

Our client welcomes the opportunity to continue a constructive dialogue over the evolution of the Local Plan and hope that the comments provided will make a valuable contribution to the consultation process.

If you have any further queries please don't hesitate to contact me.

Kind regards

**AILISH COLLINS** [redacted]  
[redacted]  
[redacted]

[redacted]  
[redacted]

[redacted] [redacted postcode].  
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London Borough of Camden  
Planning Policy  
By email: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

For the attention of the Planning Policy Team

27.06.2025

Dear London Borough of Camden,

**Re: Camden Local Plan Proposed Submission Draft (Regulation 19) Version (June 2025) on behalf of Shaftesbury Capital**

Shaftesbury Capital (SHC) is a Real Estate Investment Trust which invests in London's West End. The SHC portfolio, holds a £5bn investment portfolio across 635 buildings, it makes an important contribution to the historic heart of the West End and its global reputation as a shopping, entertainment, culture and visitor destination, as well a high-profile commercial hub. SHC also provides a significant quantum of residential accommodation and recognises the importance of the local residential community within the West End and works closely with its own tenants and wider residents to address and mitigate the challenges of an intensively used urban environment.

The SHC holdings within London Borough of Camden are within Seven Dials (Holborn and Covent Garden Ward) in the south of the Borough. We welcome the opportunity to work collaboratively with LB Camden to formulate a new Local Plan for the Borough and develop a suite of planning policies that support the West End, and the residents, workers and visitors that make it such a special part of London's role as a World City.

This representation provides feedback on the Regulation 19 version of the Camden Local Plan Proposed Submission Draft ('draft CLP') which is currently out for public consultation, and follows the representation made by SHC on the Regulation 18 version in March 2024.

**Policies Map**

The Local Plan Policies Map supports the draft CLP and confirms what planning designations apply within the Borough. In particular, the Policies Map identifies the following designations in relation to Seven Dials:

- Seven Dials Conservation Area
- South Camden
- Specialist Centre

Firstly, there is no reference to a 'specialist centre' within the draft CLP. All references are made to 'specialist areas', so the reference on the policies map key should be amended for clarity and consistency.

The policies map includes a red line around all areas within the "Central London Area" however there are no



corresponding policies which refer to this area. It is understood that this is meant to represent the Central Activities Zone, as shown in Figure 05 (Page 41), as is referred to throughout the draft CLP. For clarity and consistency, this reference on the policies map key should be amended.

### **Policy S1 - South Camden**

SHC's primary landholdings are within Seven Dials, part of Covent Garden, in the South of the Borough. Within the portfolio, we manage a wide mix of uses to help foster a vibrant and thriving destination where people work, live and visit, delivering long-term social and economic value with job creation. Seven Dials is a vibrant part of the West End, and a fair representation of this mix of uses is warranted through the local plan to ensure that policies are supportive, rather than prohibitive, of this role.

In the draft CLP, Seven Dials is identified at Figure 05 as within the Central Activity Zone, Neighbourhood Centre and as a 'Specialist Area'. Specialist Areas are described in Policy IE6 as areas that are *"distinguished by their clusters of independent and niche retailing, or for the range of food and drink uses, and some may be a visitor attraction in their own right"*.

As set out in our representation on the Regulation 18 version of the Local Plan, we do not consider that the designation of Seven Dials (Covent Garden) as a Specialist Area, fairly nor appropriately demonstrates the mix of uses and the contribution Seven Dials makes to the West End leisure and night-time economy. SHC are wholly supportive of the retail and town centre uses that Seven Dials is known for, however the strong food and beverage economy within Seven Dials, as well as theatres, night clubs and an established residential community is more akin to a CAZ retail cluster and should be reflected in the Draft CLP.

As evidenced within the Camden Retail and Leisure Study published in January 2024 (which is part of the evidence base for the draft Local Plan), Seven Dials supports a diverse range of uses, including 54% retail, 26% food and beverage (of which 7% are bars, nightclubs and public houses) and 20% other uses.



## EVENING / NIGHT TIME ECONOMY

Covent Garden (Seven Dials)	Number	%	Camden Average (%)
Bars, Nightclubs & Public Houses	17	6.9	3.9%

Camden's recently adopted Evening & Night-Time Strategy 2024-2029 further highlights that Camden's evening and night-time activity is strongest in the south, with 48% of licensed venues located in the south, and a high concentration around the Seven Dials area.

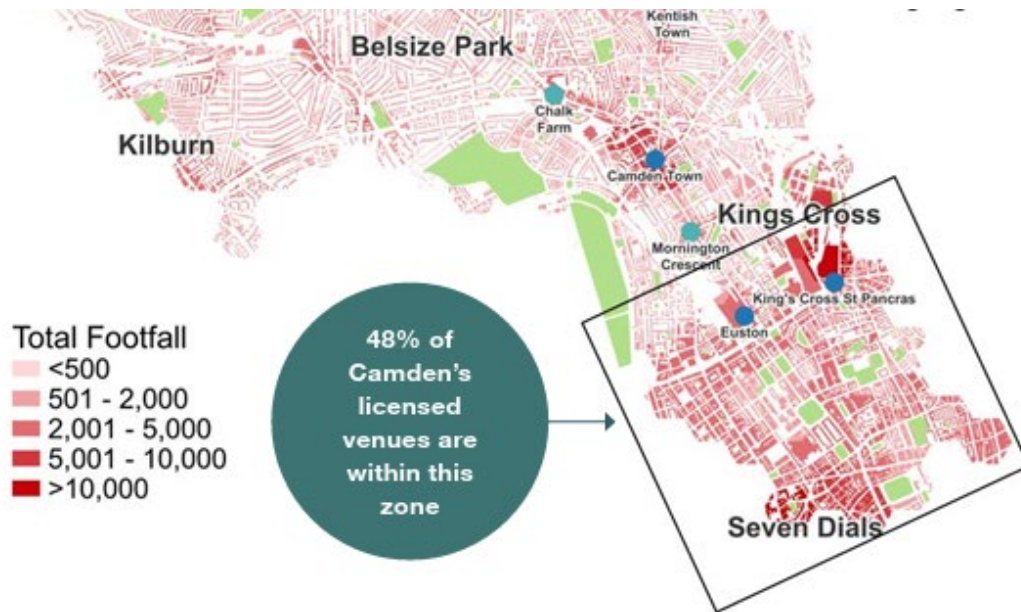


Figure 8: Footfall density, 6-9pm, with active ENT London Underground stations

The attributes of a CAZ retail cluster support appropriate intensification of uses including leisure and night-time economy uses. Part T of Policy S1 recognises the key focus of evening and night-time economy uses within the south of the Borough, however the policy goes on to state that the Council will support a range of evening and night-time economy uses in the CAZ retail clusters, with no mention of the support for these uses within Specialist Areas.

Policy S1 is worded as follows:

*S - The Council will support and protect the CAZ retail clusters, Specialist Shopping Areas and Neighbourhood Centres in the South of the borough, in accordance with Policy IE6 (Supporting town centres and high streets), to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors. As part of this, the Council will continue to manage the location and concentration of food, drink and entertainment uses in this area and their impact.*

*T - The south of the borough is also a key focus of the evening and night-time economy in Camden, and the Council will support efforts to widen the range of evening and night-time economy uses in the CAZ retail clusters, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council's Evening and Night-time Economy Strategy.*

If Seven Dials is 'pigeonholed' as a specialist shopping area, this could be harmful to the ability for high streets to diversify and adapt over time in terms of land use, impacting the character and vitality of the centre. This highlights the need for a flexible, place-based approach that supports well-managed areas like Seven Dials, where a vibrant cultural





and hospitality offer coexists with residential and commercial uses. It is important that Policy S1 recognises the true character of areas and the Council in its application of land use policy seeks to support the existing mix of uses – particularly in the most southerly part of the Borough that has strong links with the West End economy, CAZ and neighbouring City of Westminster.

### **Policy IE2 - Offices**

The Draft CLP acknowledges the significant shift in working environments over the last 4 years as a result of the Covid-19 Pandemic, including a greater number of employees working from home. Whilst the policy wording seeks to continue to protect existing office stock, there is some relaxation of the marketing evidence required where a loss of office floorspace is proposed.

Part C of Policy IE2 states:

- C. The loss of offices in the borough will only be considered acceptable where a comprehensive and sustained marketing campaign has been undertaken for at least 12 months, which uses a variety of agents and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction, with consideration given to the feasibility and viability of the following:*
- 1. refurbishment and modernisation of the premises to enhance its attractiveness to potential occupiers;*
  - 2. discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements; and*
  - 3. reconfiguring the premises to meet the demands of growth sectors and smaller businesses, including studios, start-ups and micro businesses.*

As set out in SHC's representation to the Regulation 18 version of the draft Local Plan, reducing the timeframe for the required marketing evidence for any proposals involving loss of office floorspace is supported. For an estates group such as SHC, it would however still not be commercially viable to leave a property in Central London vacant for 12 months.

### **Proposed Amendment:**

Where appropriate (meeting the sub parts of Part (c)(i)), the Council should consider reducing this further to 6 months.

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

Part A(4) of Policy IE6 states:

- 4. support the use of vacant or under-utilised properties for temporary (meanwhile) uses that will benefit a centre's vitality and viability;*

The above wording acknowledges the benefits of meanwhile uses in supporting the overall role and vitality of centres. Following the ongoing volatility within the retail sector, particularly following Covid-19 pandemic and changing consumer spending habits with the rise of online shopping, it is common for retail units to sit vacant for periods of time whilst new tenants are found. The ability for units to be occupied for a short period by a 'meanwhile use' is supported by SHC and aligns with the London Plan Policy SD7.

Part A(6) of Policy IE6 states:

- 6. give priority to sustaining the existing role of neighbourhood centres and specialist areas. The loss of Class E uses will be supported where there is evidence that the centre is in decline and struggling relative to other centres in Camden performing a similar role and function and where the proposed alternative use would help to reinforce the vitality and viability of the rest of the centre;*



The above policy wording fails to recognise the large mix of uses outside of Class E which often establish within the CAZ and the various neighbourhood centres, particularly in South Camden. It is overly onerous to require applicants to demonstrate that a centre is 'in decline and struggling' in order to justify the loss of Class E uses. A change of use, for instance, from a retail (Class E) use to a bar (Sui Generis) use is a commercial decision which would continue to support the vitality and vibrancy of an established centre through a vibrant mix of uses. Applications for a change of use would be subject to review and considered based on the merits of the proposal. The 'decline and struggle' of a centre should not be a prerequisite consideration for determining the appropriateness of an alternative use to Class E.

Part A(8) of Policy IE6 states:

*8. seek to widen the range of evening and night-time economy uses where there are existing concentrations of these uses and where this would be beneficial for local residents and people working on night shifts;*

SHC support the inclusion of the above policy insofar as it supports a range of evening and night-time economy uses within centres, where appropriate.

Part A(9) of Policy IE6 states:

*9. resist proposals involving the formation of larger units where this would harm the character or role of a centre, particularly where this would be detrimental to the supply of low cost and affordable space and the centre has an established role in accommodating independent and specialist retail;*

The above policy does not recognise the need to amalgamate smaller individual units into larger units from a commercial perspective to make the units viable, particularly in light of onerous building regulations around fire safety and disabled access, and mechanical and electrical requirements which significantly reduce the area of tradeable floorspace. Notwithstanding this, all proposals must be considered on their merits, including impact on residential amenity through intensification of uses, and external design of shopfronts, and should not be resisted solely based on an established role or character of a centre.

### **Policy CC1 – Responding to the Climate Emergency**

SHC supports the Council's efforts to minimise carbon emissions from existing buildings and mitigate the effects of climate change through energy efficiency policies.

Part B of Policy CC1 states:

*B. The Council will expect developers to demonstrate how sustainable development principles have been incorporated in the design and proposed implementation of their scheme. For developments creating one or more additional homes or delivering 500 sqm or more of additional or re-provided floorspace a Sustainability Statement will be required.*

It is noted that the wording of this policy has been amended since the Regulation 18 version of the draft CLP and now includes a minimum threshold for when a Sustainability Statement is required to be submitted as part of a planning application. SHC support the inclusion of this threshold as this provides greater clarity for applicants for when an assessment of sustainable principles should reasonably be provided.

The wording of policy CC1 does not, however, provide any flexibility for situations where historic buildings or existing building stock are being refurbished or re-used, and may not be able to meet the Council's sustainability targets. Additional wording should be added to the supporting text of this policy to acknowledge such situations.

### **Proposed Amendment:**

Inclusion of an additional commentary:



*The Council recognises that sustainability in heritage buildings seeking to deliver modern energy efficiency and environmental impact reduction will need to be balanced with heritage conservation.*

### **Policy CC2 – Prioritising the retention of existing buildings**

SHC support and endorse the policy initiatives to improve existing building stock and are reviewing all properties in our portfolio to understand what retrofit opportunities exist to improve both building and operational energy efficiencies.

Part D and E of Policy CC2 states:

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

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

Supporting paragraph 8.26 further clarifies:

*8.26 Development proposals that involve less than substantial or substantial demolition must include a pre-demolition audit to identify all materials within the building and document how they will be managed in line with the waste hierarchy. This should demonstrate that the re-use of materials has been fully explored on site and that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste). A post-completion demolition and waste audit will also be requested to ensure the plan for managing materials has been implemented.*

A large majority of SHC schemes involve retrofitting existing buildings, which should be welcomed in principle. However, there are often minor works internally that require some demolition to adjust the internal arrangement, and these works themselves do not require planning permission, albeit they may be part of a wider scheme that does require planning permission. It therefore should not be for the planning system to control or assess the level of demolition against the circular economy or reduction of waste principals where it is a retrofit scheme with no additional floorspace or only a minor increase in floorspace.

The requirement for a pre-demolition audit for development proposals that involve less than substantial demolition (i.e. where less than 50% of the building's floorspace would be removed) is overly onerous and costly for applicants where only a small level of demolition is proposed. This should only be required for planning applications involving substantial demolition (over 50%), to ensure that the reporting is commensurate with the scale of demolition proposed. Paragraph 8.26 as currently worded captures any demolition proposals, which is surely not the intention as this is unnecessarily prohibitive for applicants and creates uncertainty around validation requirements.

#### **Proposed Amendment:**

Amend Paragraph 8.26 to exclude minor internal demolition works

### **Policy CC5 - Sustainability improvements to existing buildings (retrofitting)**

As set out above, SHC support Camden's initiatives for retrofitting existing buildings through re-purposing, refurbishment and re-use.

Part B of Policy CC5 states:



*B. Where works are proposed to a listed building, whole building retrofit plans are recommended, in accordance with Policy D5 (Historic Environment).*

The suggestion to follow a 'whole building approach' when retrofitting existing listed buildings is highly aspirational and not always practical when the entire building is not under one ownership. Acknowledgement of ownership or leasing restrictions should be made within the supporting text to Policy CC5.

It is, however, recognised that applicants are 'recommended' to provide a Retrofit Plan (rather than an adopted validation requirement), and we support this wording as this provides applicants with the flexibility to submit this as and when appropriate and commensurate with the proposed scheme.

#### **Policy CC6 - Energy use and the generation of Renewable Energy**

Part C and D of Policy CC6 states:

*C. The Council will expect proposals for works to an existing building that includes the provision of 500sqm or more of additional or re-provided floorspace, or creates one or more additional home, to:*

- 4. be fossil fuel free and use low carbon heat;*
- 5. maximise the generation of renewable energy (through solar PV) where feasible;*
- 6. take measures to reduce the amount of energy needed to heat the building over a year to meet the following space heating demand targets (unless demonstrated to the Council's satisfaction that it is not feasible):*
  - a. 105 kWh/m2/year for residential conversions;*
  - b. 85 kWh/m2/year for homes created by upward extension; and*
  - c. 60 kWh/m2/year for non-residential development;*
- 7. be designed to use as little total energy as possible, to meet the following Energy Use Intensity targets (unless demonstrated to the Council's satisfaction that it is not feasible):*
  - a. 70 kWh/m2/year for residential; and*
  - b. 115 kWh/m2/year for non-residential.*

*D. Non-residential development that provides 500sqm or more of additional or reprovided floorspace will be expected to achieve a minimum of 'Excellent' in BREEAM non-domestic refurbishment.*

Both of the above policies would be triggered in situations where a change of use of an existing building over 500sqm occurs, as this would be considered "reprovided floorspace". It is overly onerous to require schemes involving reprovided floorspace to meet these energy efficiency standards. In particular, where involving works to a listed building. It is however acknowledged that the Council has included some flexibility to allow non-compliance with some sustainability targets if it can be demonstrated that these are not feasible, which is supported.

It is unclear how the space heating target (Item 3a) can be higher than the overall total building Energy Use Intensity targets (item 4a) for existing buildings. Further investigation into these figures is required.

Additionally, the ability for schemes which involve refurbishment or retrofitting of existing buildings to achieve a BREEAM score of 'Excellent' is incredibly difficult, as many credits can often only be achieved at an early stage of construction. As SC projects are often minor refurbishment projects, this would be unreasonably restrictive.

#### **Proposed Amendment:**

It is proposed that the threshold is raised to apply to major developments only for Parts C and D of Policy CC6. Further review of the space heating target and Energy Use Intensity targets in Part 3 and 4 are required.

#### **Policy CC8 - Overheating and Cooling**



In general, this policy wording seeks to resist applications that include active cooling and promote natural (non-mechanical) cooling.

Part A(4) of Policy CC8 states:

*4. only permit applications for new and/or additional active cooling systems or units where all other feasible measures in the cooling hierarchy have been integrated into the development and there is still a clear need for active cooling demonstrated by dynamic thermal modelling. Where applications for active cooling are considered acceptable, the energy used to operate the active cooling system should be offset through the installation of solar PV and greening, to help cool the local environment, where feasible; and*

In the case of most existing buildings, it is increasingly difficult to incorporate passive measures as the fabric is largely existing, including measures such as floor to ceiling levels which cannot be changed without significant alteration. As many of SHC's properties are occupied by restaurant tenants which contain kitchens with higher heat gains, there is a requirement for active cooling to be provided to meet the peak summer conditions. This will allow the space to be suitable for use by incoming tenants and their customers. The use of design measures such as shutters and blinds, ceiling fans or changes to window sizes is almost always not possible for ground floor commercial units which rely on active and open frontages for trading.

The requirement to provide photovoltaics to offset the installation of such required cooling equipment is also considered to be overly onerous and doesn't take into account certain site characteristics such as roof space, heritage assets, or general building design which may not lend itself to accommodate PVs. This also may not also be possible due to ownership or leasing restrictions.

#### **Proposed amendment**

The policy should recognise that greater flexibility is required for use of active cooling in existing and heritage buildings to ensure the long-term viability of these buildings where changes to the building fabric and design is not always possible.

#### **Proposed policies for review / amendment**

Taking the above into account, Shaftesbury Capital seek that a number of changes are made to the draft Camden Local Plan, primarily as it relates to the Seven Dials estate. These changes are summarised below:

- Policy S1 – Support the policy as drafted, subject to Seven Dials being recognised as a CAZ retail cluster.
- Policy IE2 – Support the relaxation of the marketing period for proposals involving loss of office floorspace, but consider a period of 6 months is more appropriate.
- Policy IE6 – Support the flexibility for temporary or 'meanwhile' uses of vacant properties as set out in Part A(4).
- Policy IE6 – Object to the requirement for applicants to demonstrate that a centre is 'in decline and struggling' in order to justify the loss of Class E uses as set out in Part A(6).
- Policy IE6 – Support Camden's position to widen the range of evening and night-time economy uses as set out in Part A(8).
- Policy IE6 – Remove Part A(9) as it relates to resisting amalgamation of units.
- Policy CC1 – Support inclusion of a threshold in Part B to clarify when Sustainability Statements are required to be submitted to support a planning application.
- Policy CC1 – Amend supporting text to further acknowledge circumstances where energy efficient improvements to buildings cannot always be made due to heritage considerations.

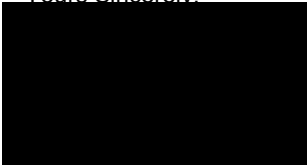


- Policy CC2 – Object to the requirement to provide a pre-demolition audit for applications proposing 'less than substantial demolition' in Part B and supporting text 8.26.
- Policy CC5 – Amend supporting text to clarify that a 'whole building approach' is not always possible when retrofitting existing listed buildings due to ownership.
- Policy CC6 – Object to the threshold for Part C and D and propose applying this to major development schemes only. Review the space heating demand targets and Energy Use Intensity targets in Part 3 and 4.
- Policy CC8 – Object to the requirement to offset energy used to operate active cooling systems through installation of solar PV and greening and require further flexibility around the use of active cooling in existing buildings where design changes are limited.

### **Conclusion**

Shaftesbury Capital welcome the opportunity to continue a constructive dialogue over the evolution of the draft Camden Local Plan and hope our comments, borne out of our practical experience, will make a valuable contribution to the consultation process. We welcome further discussion on the topics raised in this letter and hope to engage with you further soon.

Yours Sincerely,



Andy Hicks



Date: Fri, 27 Jun 2025 14:38:59 +0000

From: Elizabeth Woodall

To: PlanningPolicy

Subject: Submission of Representations on the Camden Local Plan Proposed  
Submission Draft by Stadium Capital Holdings

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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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.

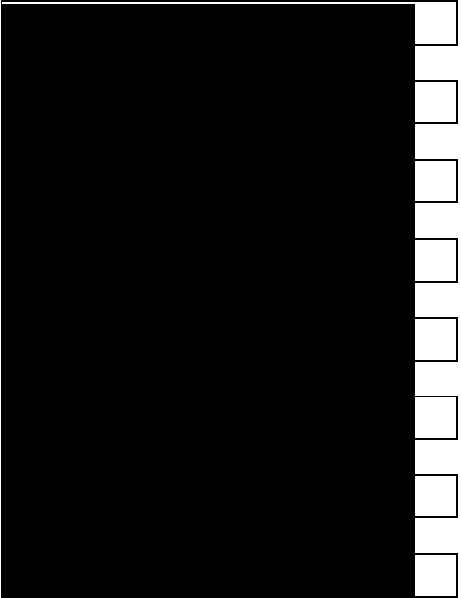
Before completing this representation form please refer to the attached guidance notes.

### 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	-	Mrs
First Name	-	Elizabeth
Last Name	-	Woodall
Job Title (where relevant)	Stadium Capital Holdings	
Organisation (where relevant)		
Address Line 1*	C/O Agent	
Address Line 2	C/O Agent	
Post Town*		
Post Code*		
Telephone Number		
E-mail Address		



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

Name or Organisation: Stadium Capital Holdings

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

Documents can be found at the following links:

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

Paragraph

Policy

Policy W9

Policies Map

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

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

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

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

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

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

Please see accompanying document.

(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 see accompanying document.

(Continue on a separate sheet if necessary)

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

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

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

☒ X

No

☐

Yes

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

N/A

**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](#).

<b>11. Signature:</b>	<b>Elizabeth Woodall</b>	<b>Date:</b>	<b>27/06/2025</b>
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**Part B – Please use a separate page for each representation**

**Name or Organisation:** Stadium Capital Holdings

**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

D2 (Tall Buildings)

Policies Map

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

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

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

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

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(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"/>
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(4) Consistent with national policy	<input checked="" type="checkbox"/>

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Please see accompanying document.

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

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☒ X

No

☐ Yes

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

N/A

**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.

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<b>11. Signature:</b>	<b>Elizabeth Woodall</b>	<b>Date:</b>	<b>27/06/2025</b>
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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.



**CAMDEN LOCAL PLAN - PROPOSED SUBMISSION DRAFT (REGULATION 19) JUNE 2025 - SUBMISSION OF REPRESENTATIONS**

On behalf of our client, Stadium Capital Holdings, we hereby formally submit written representations in respect of the Proposed Submission Draft (Regulation 19) Local Plan. This should be read in conjunction with the representations made on the Regulation 18 draft in March 2024, attached as [Appendix 1](#). The representations relate specifically to Site Allocation Policy W9 - Land at Midland Crescent, Finchley Road, NW3 6NA, and Policy D2 (Tall Buildings).

Since the previous round of consultation on the draft Local Plan in early 2024, the Government has made some radical changes to the NPPF and the PPG with the aim of delivering 1.5 million homes across the country over the Parliament. The new Framework reintroduces the mandatory five-year housing land supply (5YHLS) requirement for local planning authorities. Also of note, a section 73 application (ref: 2025/0484/P) for amendments to the O2 Centre redevelopment immediately to the south of Midland Crescent has been submitted to LB Camden. The proposals include a series of design changes, including an additional 1-2 storeys across the detailed element buildings, with approximately 5.8m of height added to the tallest block(s) along the northern boundary.

Stadium Capital Holidays are supportive of the general aims of Site Allocation Policy W9 and Policy D2 (Tall Buildings). However, it is important that the policies are sufficiently flexible to avoid unintended consequences, as set out below.

Site Allocation W9 - Land at Midland Crescent, Finchley Road

The indicative site capacity in the current draft plan reflects the extant permission dated March 2015 (2014/5527/P). The national, regional and local planning policy position has shifted considerably in the ten year period since then, and there is now a greater emphasis than ever before on optimising brownfield land in sustainable urban locations. The site is located within the West Hampstead Growth Area, with its Finchley Road frontage falling within a designated Town Centre. In addition, and as alluded to above, the immediate surrounding area is experiencing major transformation following approval of the O2 Centre redevelopment in December 2023 (ref: 2022/0528/P) for approximately 1,800 new homes and 17,000 sqm of commercial area in buildings of up to 15 storeys, alongside workspace, community floorspace and public realm enhancements.

To ensure that the site’s development potential is optimised, we reiterate that the draft allocation should be amended as follows (see text **in red** in columns 4 and 5):

Reference	Address	Allocated use	Indicative capacity	Key considerations
W9	Land at Midland Crescent / Finchley Road	Mixed use including permanent self-contained homes, student housing and town centre uses	<p>Current wording:</p> <p>9 additional homes and 60 student rooms or equivalent residential floorspace</p> <p><b>Proposed wording:</b></p>	<p>Current wording:</p> <p>Planning permission (2014/5527P) has been granted and initial works commenced, so the permission remains extant. If a new scheme comes forward, a Flood Risk Assessment will be</p>

Subject to a careful design and massing, the site is capable of accommodating a tall building on the Finchley Road frontage.

required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified as being at risk of flooding.

Proposed wording:

New development should apply a design-led approach to achieve the optimum development capacity of the site, while considering heritage, townscape and neighbour amenity. Any future planning applications should take into account that the site is within a Flood Risk Area.

At the very least, Site Allocation W9 should reflect what is said in the Camden Building Heights Study, namely that *“there may be an opportunity for a large building up to the tall building threshold”*. We note that a potentially appropriate height range of 9-30 metres is also quoted.

#### Policy D2 (Tall Buildings)

Policy D2 should be amended to recognise instances where they may be opportunities for tall buildings which could deliver public benefits, including enhancement to townscape, outside of the areas identified in Figure 22 and listed in Table 12. Following on from London Plan Policy GG2 that stresses the importance of making the best use of land, London Plan Policy D3 seeks to optimise site capacity through the design-led approach and makes the point that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. This is against the backdrop of national planning policy that promotes the efficient use of land, with the prioritisation of previously developed (brownfield) land for housing and other needs.

It is therefore important that the policy provides a degree of flexibility to make the most efficient use of highly sustainable and well-connected brownfield sites, such as Midland Crescent.

We appreciate your consideration of these representations and look forward to further engagement in the planning process. Further details of the site and ownership are provided within the accompanying form.



## Appendix 1 - Representations submitted in response to Regulation 18 consultation (March 2024)

**DRAFT NEW CAMDEN LOCAL PLAN JANUARY 2023 CONSULTATION (REGULATION 18)****Draft Site Allocation W8 (WHI5a): Land at Midland Crescent Finchley Road London NW3 6NA**

On behalf of our client Stadium Capital Holdings Ltd, we hereby formally submit written representations in response to the Draft New Camden Local Plan Regulation 18 Consultation Version (January 2024). The representations specifically relate to the Land at Midland Crescent Finchley Road London NW3 6NA (the Site), which forms Site Allocation W8 (WHI5a) in the Draft Local Plan. A site location plan is enclosed.

Site Context

The Site is situated within the West Hampstead Growth Area as outlined in the adopted Local Plan, with its Finchley Road frontage falling within a designated Town Centre. It is highly accessible and sits in close proximity to several stations, the most noteworthy being Finchley Road underground, West Hampstead underground, West Hampstead overground and West Hampstead Thameslink stations.

Notably, the Site is located immediately north of the O2 Centre site which benefits from a recent hybrid planning permission (ref: 2022/0528/P) granted on 20 December 2023. The scheme comprises new buildings that reach a maximum height of 15 storeys. The development includes c.1,800 new homes, c.17,000 sqm of commercial, workspace and community floorspace and public realm enhancements.

Although the Site does not fall within a Conservation Area or have any listed buildings, the Site is located west of the Redington/Frognaal Conservation Area and Fitzjohn's/Netherhall Conservation Area boundaries. Additionally, the Site is within Flood Risk Zone 1.

Planning History

The Site has had an active planning history since the early 2000s. The key decisions are summarised below:

- PWX0002163, granted on 25 October 2005: Erection of a basement plus four storey building, with retail (Class A1) and food & drink (Class A3) uses on the front part of the ground floor and office use (Class B1a) in the basement, part ground floor and three upper floors. The planning permission has been implemented.
- 2013/0880/P, refused 4 June 2013: Erection of a four/five storey building, featuring a double basement, and accommodating 138 student rooms and 1,240 sqm of flexible commercial space.
- 2013/2564/P, refused 31 July 2013: Redevelopment involving with a mixed-use building (up to 5 storeys), including 116 student rooms and 1,058 sqm of commercial space. A subsequent appeal was dismissed on 2 April 2014.
- 2013/4575/P, refused 17 October 2013: The proposed development involved constructing a multi-story building (up to 5 storeys) with flexible commercial space on the lower floors, 92 student rooms, and 9 residential dwellings. A subsequent appeal was dismissed on 2 April 2014.
- 2014/5527/P, approved on 25 March 2015: The scheme included a new building comprising a part 3, part 4 and part 5 storey building with a double level basement containing flexible commercial space at lower basement and ground floor levels, 60 student rooms and 9 residential dwellings.

### Planning Policy Position

Chapter 11 of the National Planning Policy Framework (NPPF) promotes the efficient use of land, endorsing the prioritisation of previously developed land (brownfield sites) for housing and other needs, all while preserving the environment and ensuring safe living conditions. In February 2024, the Government launched consultations on changes to national policy to strengthen planning support for brownfield development, and further changes to permitted development rights (PDRs).

Chapter 11 of the NPPF is reinforced by London Plan Policy GG2(a), which encourages new mixed-use development on brownfield land, specifically sites within and on the edge of town centres.

Camden's adopted Local Plan Policy G1 advocates high-quality development that makes the best use of its site, considering design quality, sustainability, amenities, heritage, transport accessibility, and other relevant factors. It seeks explicitly to *"resist development that makes inefficient use of Camden's limited land."* Finchley Road and West Hampstead are identified as an area with significant growth potential.

Draft Policy W1 of the Draft New Camden Local Plan recognises the importance of sustainable growth in West Camden, and specifically West Hampstead. Draft Policy IE1 seeks to secure a strong, diverse, sustainable and inclusive economy in Camden through *"working with landowners and developers to bring forward comprehensive mixed use regeneration proposals that provide for the intensification of under-utilised sites/land to deliver employment uses and other priority uses"*.

### Summary and proposed Site Allocation amendments:

In light of the above, the Site represents a clear candidate for intensified development in accordance with the aims of the NPPF, London Plan and Local Plan (both new and emerging). It is our view that the current wording of the Draft Site Allocation W8 (WHI5a) is restrictive and impedes the potential to make the most efficient use of this highly sustainable and well-connected brownfield site. This contradicts with the direction set by the emerging national and local policy.

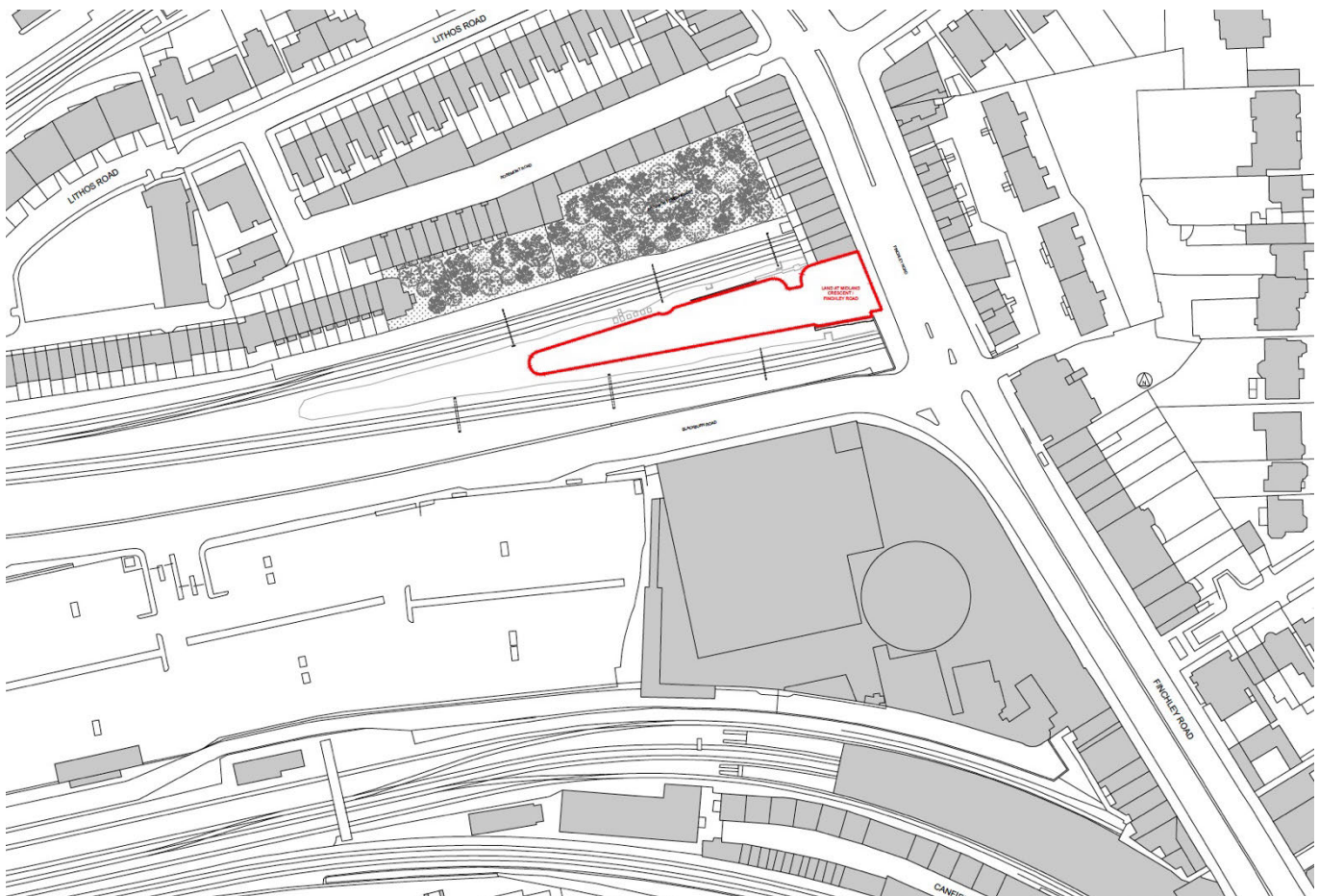
Although the Site benefits from approved schemes in 2005 and 2015, the national, regional and local planning policy position has shifted since these decisions were granted, and there is now a greater emphasis on optimising brownfield land in sustainable urban locations. In addition, there is an emerging built context in the immediate vicinity of the Site, owing to the recent O2 Centre site planning permission, which sets a precedent for larger scaled development at this part of Finchley Road.

To ensure that the site's development potential is optimised, we propose (see red text) that the draft Site Allocation W8 (WHI5a) be amended as follows:

## Proposed Site Allocation W8 (WHI5a) wording

Reference	Address	Allocated use	Indicative capacity	Key considerations
W8 (WHI5a)	Land at Midland Crescent / Finchley Road	The site is suitable for a range of town centre uses, including forms of housing.	Subject to a careful design and massing, the site is capable of accommodating a taller building on the Finchley Road frontage.	New development should apply a design-led approach to achieve the optimum development capacity of the site, while considering heritage, townscape and neighbour amenity. Any future planning applications should take into account that the site is within a Flood Risk Area.

## Site Location Plan



We appreciate your consideration of these representations and look forward to further engagement in the planning process. Further details of the site and ownership are provided within the covering email.

Date: Fri, 27 Jun 2025 14:39:27 +0000  
From: Julie Papouskova, NTA Planning  
To: PlanningPolicy  
Subject: Camden Local Plan Proposed Submission Draft Consultation - Submission of Representation Form

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We hereby submit our completed representation form to the Camden Local Plan Proposed Submission Draft Consultation.

Please find this attached.

Kind regards,

**JULIE PAPOUSKOVA**

[Redacted signature block]

## 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.

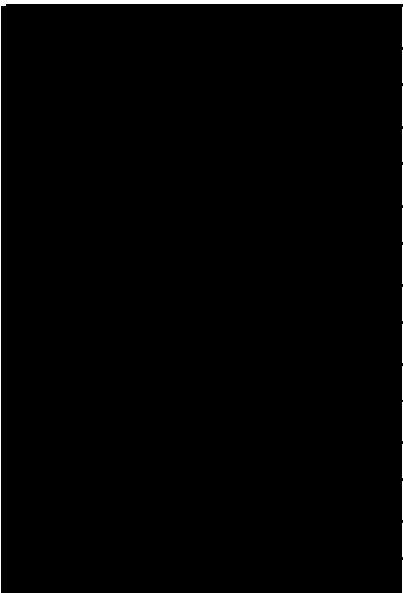
Before completing this representation form please refer to the attached guidance notes.

### 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"/>	Miss
First Name	<input type="text"/>	Julie
Last Name	<input type="text"/>	Papouskova
Job Title (where relevant)	<input type="text"/>	
Organisation (where relevant)	<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:

**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

Site Allocation S6

**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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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

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

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

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

**Site Allocation S5 (120 – 136 Camley Street)**

Our client owns a long leasehold interest in no. 106 Camley Street and comprises a considerable portion of site allocation S6 (104 – 114 Camley Street and Cedar Way Industrial Estate). Like S6, site allocation S5 is situated within the CNSP area and is subject to the Council's adopted Canalside to Camley Street SPD.

We welcome the allocation's aspiration for self-contained residential, and employment uses, with an indicative capacity of 110 additional homes. In combination with site allocation S6, there is greater capacity for additional homes.

In terms of the development and design principles set out in the supporting text for this site allocation, we would argue that, in order to follow a co-ordinated approach with development on site allocation S6, these principles should go further in promoting the flexibility of employment and compatibility of uses. The principles should promote flexible and viable land uses in this brownfield location, so as to align with national planning policy aspirations, aspirations of the emerging London Plan (as set out within the 'Towards a New London Plan' document which has recently been consulted on), and the aspirations set out within the CSNP and the SPD.

**Site Allocation S6 (104 – 114 Camley Street and Cedar Way Industrial Estate)**

Our client owns a long leasehold interest in no. 106 Camley Street. The Site forms part of a consortium of adjoining landowners, where discussions are ongoing. We support the allocated use for permanent self-contained homes and employment (including research and knowledge-based uses, light industrial, maker spaces, offices). We have previously submitted representations on the Camley Street Neighbourhood Plan (CSNP), seeking to promote the comprehensive redevelopment of the CSNP area. Our client supports the CSNP community's aspirations for the area to mature into a blend of mixed land uses. Our client also supports the vision of the Council's adopted Canalside to Camley Street SPD for the area to undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.

Similarly, our client seeks to maximise the development potential of their site which would provide employment and residential opportunities as well as community and environmental benefits. This is in line with the development and design principle no.2 as set out for site allocation S6 in the Camden Local Plan Proposed Submission Draft, which stipulates that development must be taken forward in a coordinated way, working jointly with other landowners.

(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.

**Site Allocation S6 (104 – 114 Camley Street and Cedar Way Industrial Estate)**

We note that the development and design principles set out in the Camden Local Plan Proposed Submission Draft for this site allocation, namely principle no. 5, seek to optimise the use of the site to enable the co-location of housing, employment, and other proposed uses. While we agree that the introduction of non-employment uses should not compromise the operation of employment uses, we also feel that the supporting text to site allocation S6 does not go far enough to promote opportunities for mixed-use intensification.

In line with the emerging London Plan (as set out in the 'Towards a New London Plan' document which has recently been consulted on), the Camden Local Plan Proposed Submission Draft must support flexible uses as part of a wider co-location and hybrid use strategy. Ultimately supporting more efficient and intensified use of brownfield land in line with national planning policy aspiration of making the best use of brownfield land. We would argue for greater intensification of land use on such suitable land.

The Camden Local Plan Proposed Submission Draft must align with the sentiment expressed in the adopted Canalside to Camley Street SPD and Camley Street Neighbourhood Plan, particularly as Camden Council owns the freehold of a significant portion of the CSNP area (including the cedar Way Industrial Estate). The vision of the SPD and the CSNP seeks to maximise development potential of the sites. As such, the Local Plan Proposed Submission Draft should further emphasise the sentiment to enable flexible uses in principle no.6, which lists the variety of employment spaces and facilities that could meet the needs of both existing and new business uses.

Given that significant parts of the CSNP area will be subject to the guidance set out in the SPD, large parts are expected to be comprehensively redeveloped, it would be prudent to allow the greatest flexibility in uses within the CSNP area.

(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

☒

X

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:

Our client's long leasehold interest comprises a significant proportion of the wider site allocation at S6 (104 – 114 Camley Street and Cedar Way Industrial Estate) and is situated at the centre of the allocation. As such, we consider it important for our client to be afforded the opportunity to participate at examination hearings. Given Camden Council's significant freehold interest in the CSNP area, and the Local Plan Proposed Submission Draft's policy aspirations of working jointly with other landowners, we would expect our client's participation in the examination hearings to be welcome.

**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:	Julie Papouskova	Date:	27/06/2025
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

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

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

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

## 3. Soundness

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

### • ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

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

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

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

Date: Fri, 27 Jun 2025 14:40:14 +0000  
From: Gabriella Bexson  
To: PlanningPolicy  
Subject: Camden Local Plan Representations - Camden Mixed Developments Ltd

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Montagu Evans LLP,[redacted address] [redacted]  
[redacted email]

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Montagu Evans LLP is a limited liability partnership registered in England and Wales. Registered number OC312072. A list of members' names is available for inspection at the registered office [redacted address] Mary Axe, London [redacted postcode].

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

Dear Sir / Madam

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

Camden Mixed Developments Ltd is a subsidiary of Sellar Design and Development Limited - a design-led developer, investor and asset manager who have delivered some of London's most progressive projects. They are a key stakeholder in LBC.

## Priorities & Objectives

Camden Mixed Developments Ltd 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;

LONDON | EDINBURGH | GLASGOW | MANCHESTER

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A list of members names is available at the above address.




- Supporting high quality, sustainable and inclusive design;
- Promoting active and sustainable travel;
- 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 Camden Town Over Station Development.

#### Draft Site Allocation C17 Camden Town over station development

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

<b>Site Plan</b>	
<b>Address</b>	Camden Town over station development
<b>Area</b>	0.5 hectares
<b>Allocated Uses</b>	Permanent self-contained homes and student accommodation, employment uses (including maker spaces, creative industries and offices), retail, and food and drink uses (on the ground level).
<b>Allocated Uses Representation</b>	<p>The allocated uses are supported and should be maintained, however, the range of allocated uses should be further broadened to support a greater range of town centre uses, meeting the needs of businesses and local people. It is considered that these uses should include other flexible residential products, in addition to self-contained homes and student accommodation, such as co-living as well as hotel.</p> <p>Co-living is an appropriate use for the Site given its high accessibility and location within a town centre, in accordance with London Plan guidance on large-scale purpose-built shared living. Co-living would deliver a diverse housing offer, contributing positively to the character of the area and the creation of mixed and inclusive neighbourhoods. This use would help support the needs of a growing and dynamic population, including young professionals and key workers, contributing to an element of housing choice.</p>

	<p>In addition, a hotel use in this location would be entirely appropriate given the Site's highly accessible location within the Camden Town, Town centre where small and medium scale visitor accommodation is consistent with the aims and objectives of emerging Local Plan Policy IE5. Further, a hotel use would provide employment opportunities, in a range of roles.</p> <p>It is important that the allocation allows the Site to optimise capacity, meeting the needs of the local economy, providing homes for local people, and allowing the area to thrive. The allocation should ensure that it does not hinder appropriate and viable alternative uses coming forward.</p> <p>Camden Mixed Developments Ltd is supportive of the overall ambition to deliver a mixed-use development incorporating a new station entrance and ancillary supporting facilities for the station. It is requested that the allocation allows for flexibility in residential uses (self-contained homes, student accommodation and co-living), alongside the range of employment uses (including maker spaces, creative industries and offices), with retail and food and drink, and hotel use.</p>
<b>Indicative Housing Capacity</b>	58 additional self-contained homes
<b>Description of Existing Use</b>	<p>The Camden Town over-station development site is located in the heart of Camden Town. Transport for London (TfL) have acquired land to facilitate construction work associated with the station capacity project and to ensure the existing station entrance can stay open. The site includes 5-7 Buck Street which formerly served as an auction house and has more recently served as temporary affordable workspace for young entrepreneurs. The former Hawley Wharf infant school building was vacated in 2016, when the school relocated and has also been in temporary use. The Buck Street Market site fronting on to Camden High Road is currently used as a temporary box park market and food and drink premises. There is an existing ventilation shaft for the underground lines on part of the site adjacent to Buck Street; this would not be required for future upgrades to the station.</p>
<b>Context</b>	<ul style="list-style-type: none"> <li>• Transport for London (TfL) have ambitions to upgrade station capacity at Camden Town Underground Station and this remains a TfL ambition within the Plan period, however sufficient funding needs to be secured.</li> <li>• Subject to funding being secured, delivery of the station capacity upgrade and a new station entrance will be contingent on a Transport and Works Act Order being confirmed by the Secretary of State, and therefore planning permission for these works is not required. The over-station development will, however, require a planning application to be submitted.</li> <li>• The Council will expect landowners and developers to take a collaborative approach, working across site boundaries, to ensure a well-designed and successfully implemented scheme. A shared site agreement should be agreed between the main contractor for the station capacity project and the developer responsible for the construction works above the station, to ensure impacts on TfL's assets are appropriately assessed.</li> </ul>
<b>Development and Design Principles</b>	<p>Development must:</p> <ol style="list-style-type: none"> <li>1. be designed to deliver a mixed use development incorporating a new station entrance and ancillary supporting facilities for the station, permanent self-contained homes, and employment uses, including retail along the Buck Street and Kentish Town Road frontages;</li> <li>2. optimise the delivery of permanent self contained homes in accordance with Policy H1 (Maximising Housing Supply). Where student accommodation is proposed this should be in accordance with Policy H9 (Purpose-built Student Accommodation);</li> <li>3. ensure that a design-led approach is taken to delivering the optimum amount of development on the site. Where demolition is proposed, this should be justified in accordance with Policy CC2 (Retention of Existing Buildings);</li> </ol>

	<p>4. provide a range of employment uses, giving consideration to existing uses and activities that have an established and growing presence in Camden Town, including premises for use by creative and cultural businesses, light industrial workshops, co-working space and space suitable for small and medium sized businesses;</p> <p>5. not cause harm to the continuing operation of uses on nearby sites including the Electric Ballroom;</p> <p>6. be designed to provide active frontages that engage with the street along Camden High Street, Buck Street and Kentish Town Road, with a continuous building line established along Buck Street;</p> <p>7. include noise mitigation measures to ensure that the ability of existing premises to operate effectively is not adversely affected in line with the agent of change principle, in accordance with Policy A4 (Noise and Vibration);</p> <p>8. be designed in a way that gives careful consideration to the design and layout of the residential accommodation, given its proximity to the station entrance and the levels of pedestrian activity that are anticipated when the station is operational;</p> <p>9. provide a range of retail unit sizes, appropriate to the context of Camden Town's retail role and function and the size and location of this site;</p> <p>10. respond positively and sensitively to local context and character in accordance with Policy D1 (Achieving Design Excellence) and be designed to achieve a positive relationship with the Camden Town Conservation Area and Regent's Canal Conservation Area. This is likely to involve a transition in height and scale across the site from the more intimate, low-rise nature of Stucley Place to Kentish Town Road, which is generally lined by buildings of 4-5 storeys south of Hawley Crescent;</p> <p>11. explore the creation of a new civic space in front of the station entrance to create a strong 'sense of arrival' as people emerge from the station;</p> <p>12. improve the street environment in this area, particularly along Buck Street, to ensure that it is easy and safe to move through, inclusive, and accessible for all, to meet the needs of all residents, particularly people using wheelchairs and people with physical disabilities. The provision of wider pavements along Buck Street and accessible signage for visitors and tourists could assist with this;</p> <p>13. incorporate appropriate acoustic measures to address noise from the evening and night-time operation of the station; the movement of people through the area; and the residual transmission of noise and vibration from the underground station and platforms; and</p> <p>14. be designed to work effectively alongside Transport for London's existing, enhanced or new infrastructure.</p>
<b>Development and Design Principles Representation</b>	<p>Camden Mixed Developments Ltd is supportive of the development and design led principles set out within the draft site allocation.</p> <p>Camden Mixed Developments Ltd is supportive of the overall ambition to deliver a mixed-use development incorporating a new station entrance and ancillary supporting facilities for the station. It is important that it is recognised that, in order to deliver the design led principles set-out, sufficient flexibility is allowed for in policy to respond to market conditions and the needs of the local population. As such, the range of uses set out should consider the comments made in relation to the allocated uses representation.</p> <p>The Site is currently not identified as a location where a tall building may be appropriate and is in an area that defined a tall building as being over 30 metres. This overlooks the significant</p>

	development potential inherent in an over-station scheme and may present unnecessary challenges to successful delivery. Given its context, the site presents an opportunity for a well-designed landmark building that rises above the surrounding fabric, enhancing wayfinding and improving the legibility of the area. Taller massing could be strategically positioned away from key views within the conservation area to minimise visual impact. Therefore, the policy should acknowledge and accommodate the potential for a building exceeding 30 metres in height in order to fully realise the Site's development benefits, which have the potential to be significant.
<b>Infrastructure Requirements</b>	<p>Development must:</p> <p>15. provide step-free access to Camden Town underground station;</p> <p>16. contribute to public realm improvements in the surrounding area. Priorities include the widening of pavements; protecting and enhancing cycle lanes; the delivery of urban greening measures, including tree planting; seating and signage;</p> <p>17. explore opportunities for decentralised heating and cooling (including the ability of the Underground station to supply development above ground); and</p> <p>18. Contribute towards improvements at Inverness Street Market.</p>
<b>Other Considerations</b>	<ul style="list-style-type: none"> <li>• The Council may seek to use planning conditions to ensure the long term retention of employment floorspace within Use Class E from conversion to other town centre uses.</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 Hawley Wharf school building is on the Council's Local List due to its architectural and townscape significance. The auction house/ piano factory (5-7 Buck Street), while not having any formal heritage status, is recognised as having merit in conservation and design terms. Demolition of these buildings may not require planning permission where such works are confirmed by the Secretary of State through a Transport and Works Act Order. However, the existing quality of the buildings, their heritage value, their embodied carbon, and the uses they support, should inform development requiring consent from the local planning authority and the loss of these buildings is unlikely to be acceptable without the station works coming forward on this site.</li> <li>• A Flood Risk Assessment will be required in accordance with Policy CC10 (Flood Risk), as the site is within an area identified by the Council as being at risk of flooding. Recommendations in the Flood Risk Assessment will be secured by planning condition.</li> </ul>
<b>Other Considerations Representation</b>	<p>The site allocation should be carefully framed to avoid unnecessarily restricting or hindering the development of appropriate and economically viable uses. The infrastructure requirement to deliver step-free access to Camden Town Station has the potential to stifle development coming forward on this Site. The wording of the requirement should be updated to require development to facilitate and contribute towards the delivery or step-free access. In the absence of a planning application, it is not appropriate to require such a significant infrastructure requirement, that may not be necessary or proportionate to the scale of development proposed.</p> <p>It is important that the allocated uses remain flexible and responsive to evolving market conditions, thereby enabling sustainable and beneficial developments to come forward without undue constraint.</p> <p>Emerging Policy IE6 is clear that LBC are seeking to protect and enhance the role and distinctive character of each of Camden's centres. Camden Town's vitality stems from its diversity of uses; therefore, the site allocation should enable a variety of employment opportunities and support a dynamic mix of uses that contribute to a thriving local economy.</p>

**Future Involvement in the Local Plan Process**

Camden Mixed Developments Ltd 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.

[Redacted signature block]

Yours faithfully,

*Montagu Evans*  
Montagu Evans LLP

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 CAMDEN MIXED DEVELOPMENTS LTD**

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

**Camden Mixed Developments Ltd**

Camden Mixed Developments Ltd is a subsidiary of Sellar Design and Development Limited - a design-led developer, investor and asset manager who have delivered some of London's most progressive projects. They are a key stakeholder in LBC.

Camden Mixed Developments Ltd welcome the opportunity to comment on the Regulation 19 Proposed Submission Draft of the New Local Plan. Camden Mixed Developments Ltd 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**

Grand Union House is located in a key part of Camden Town fronting Kentish Town Road, next to both the existing and new tube station entrance. A resolution to grant planning permission (2021/0911/P) was achieved in 2022 for part-demolition, in-fill, re-build and upward extension to provide additional Class E office and commercial floorspace, six residential units (Class C3), new areas of landscaping and public realm. Camden Mixed Developments Ltd ambition for the Site is to ensure the delivery of comprehensive redevelopment of the Site, improving its contribution to the town centre and Conservation Area.

**Draft Policies upon which Representations are Submitted**

These representations focus on the Site Allocation for Grand Union House.

[Draft Site Allocation C21 Grand Union House](#)

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**LONDON | EDINBURGH | GLASGOW | MANCHESTER**

Montagu Evans LLP is a limited liability partnership registered in England and Wales with registered number OC312072. Registered office 70 St Mary Axe, London, EC3A 8BE. A list of members names is available at the above address.

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

<b>Address</b>	Grand Union House, 18-20 Kentish Town Road
<b>Allocated Uses</b>	Employment (office), retail (ground floor) and permanent self-contained homes
<b>Allocated Uses Representation</b>	<p>The Site has a resolution to grant planning permission for an increase in office, flexible Class E use and residential use. The proposed uses above reflect this approved planning permission. These allocated uses are supported and should be maintained.</p> <p><u>Employment Uses</u></p> <p>The allocation is clearly written with the intention of facilitating job creation and economic activity to the benefit of the local economy and people. Camden Mixed Developments Ltd is supportive of this, and remain supportive of the allocated uses, as they continue to explore the delivery of the 2022 scheme.</p> <p>However, the short list of appropriate land uses within the allocation is too restrictive and risks preventing this important site from addressing the essential local need for a variety of spaces and uses, which support local businesses and SMEs. It is therefore requested that the allocated uses are broadened to support a wider range of employment generating uses as part of a mixed-use scheme, falling within Class E, and B8 land uses.</p> <p>The planning application that secured a resolution to grant planning permission in 2022 was granted under different economic conditions. Since then, shifts in the broader economy – particularly in the office market – have raised important questions about the deliverability of the resolved to grant scheme.</p> <p>Camden Town is synonymous with the creative industries. Jobs in that industry are not best served by traditional desk orientated, modern office space. Instead, the site's economic impact, through redevelopment, would be most keenly felt if a blend of employment uses and associated uses (such as storage / makers space / workshops) were permissible (and even actively encouraged) by the emerging allocation.</p> <p>It is widely accepted that even the most modern traditional office space is unlikely to be a viable proposition outside of core areas, even in relatively central London. Camden Town is a case in point; considerable amounts of office space in Camden Town is vacant and has been since even before the pandemic. There are several recent examples where existing office stock has gained planning permission for changes of use owing to the fact, they are typical and symptomatic of the shifting economic conditions that once supported offices in Camden Town.</p> <p>In this context, it is the challenge for both Camden Council and developers to think creatively about how these 'left behind' sites can still drive the local economy, employ local people, and allow the are to continue to thrive.</p> <p>Grand Union house was originally designed for industrial/ logistics use as part of Nicholas Grimshaw's 1980's masterplan vision. The Site has the potential to provide inner city / urban self-storage that could function as a potential 'enterprise hub' providing work and makers' space and ancillary support for small and local businesses while they establish and grow. The building is arranged to inherently adopt a B8 use, broadening the allocated uses to include this would work towards its inherent design without requiring substantial modifications to the building fabric.</p> <p>Policy C1 of the emerging Local Plan looks to prioritise the pedestrianisation of the section of Camden High Street between Camden Town Underground and Hawley Crescent / Jamestown Road. A flexible employment use could provide support for market traders by facilitating the</p>



	<p>secure storage and efficient servicing of their operations. It is our view that the allocated employment uses should be broadened beyond office.</p> <p><u>Hotel / Student Accommodation</u></p> <p>Given the Site's location within the designated Camden Town town centre, it is also considered that a range of bed-led uses would be appropriate, for example, hotels and student accommodation, in addition to self-contained homes.</p> <p>A hotel use would be entirely appropriate given the Site's highly accessible location within the town centre where small and medium scale visitor accommodation is consistent with the aims and objectives of emerging Local Plan Policy IE5. In addition, and in accordance with the aspirations of the allocation, a hotel use would provide employment opportunities, in a range of roles.</p> <p>The resolution to grant scheme establishes the suitability of self-contained homes on the Site, and this is endorsed through the allocation. Whilst self-contained homes are critical to meeting housing need, other housing types are also valuable in terms of delivering a mixed and balanced community. The Site is suitable for additional residential type uses, beyond self-contained homes, student accommodation particularly, given its excellent transport links, proximity to major educational institutions, and convenient access to a wide range of amenities within the surrounding town centre.</p> <p>Introducing dedicated student housing on this site would help alleviate pressure on the existing local housing stock by reducing demand from the student population. This, in turn, would enhance availability for private buyers, renters, and local residents. Incorporating student accommodation as part of the site's allocated uses represents a logical and appropriate extension of the self-contained residential development already envisioned in the allocation. Moreover, it directly supports the identified need for student housing as outlined in Local Plan Policy H9.</p> <p>In summary, the allocation should ensure that it does not hinder appropriate and viable uses coming forward. It is reasonable and appropriate to ensure that a mix of town centre uses are allocated for in this location. It is not appropriate to limit the Site Allocation to the land uses proposed as part of planning application 2021/0911/P, as the Site's location would be appropriate for a range of uses, in line with LBC policies.</p>
<b>Indicative Housing Capacity</b>	6
<b>Key Considerations</b>	The Council has resolved to grant planning permission (2021/0911/P) for 4000 sq m additional employment space and 6 homes. If this scheme does not come forward, then a contribution to the delivery of additional housing will be expected having regard to relevant Local Plan policies including Policy H2.
<b>Key Considerations Representation</b>	<p>The resolution to grant scheme, and its permitted uses, are acknowledged, however, as set out above, the Site Allocation should be carefully framed to avoid unnecessarily restricting or hindering the development of appropriate and economically viable uses. It is important that the allocated uses remain flexible and responsive to evolving market conditions, thereby enabling sustainable and beneficial developments to come forward without undue constraint.</p> <p>Emerging Policy IE6 is clear that LBC are seeking to protect and enhance the role and distinctive character of each of Camden's centres. Camden Town's vitality stems from its diversity of uses; therefore, the Site Allocation should enable a variety of employment opportunities and support a dynamic mix of uses that contribute to a thriving local economy. Increased flexibility in the site allocation would allow for more creative thinking to address and</p>



	<p>support job creation and local need for varied working spaces and uses that are especially well suited for Camden Town.</p> <p>It is acknowledged that self-contained residential is the priority use of the Local Plan. However, student accommodation would be in accordance with the housing policies of the Plan, help meet housing delivery targets and contribute towards creating mixed, inclusive and sustainable communities.</p>
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**Future Involvement in the Local Plan Process**

Camden Mixed Developments Ltd 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.

[Redacted signature block]

Yours faithfully,

*Montagu Evans*

Montagu Evans LLP

Responder 587

Date: Fri, 27 Jun 2025 14:40:55 +0000

From: Antonia Stratford

To: PlanningPolicy

Subject: Submission from Heart of London Business Alliance - Draft New Camden  
Local Plan

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## Camden Local Plan Consultation

### Response from Heart of London Business Alliance

#### 1. Introduction

Thank you for the opportunity to comment on the draft revisions to the Camden Local Plan. This response from Heart of London Business Alliance (HOLBA) focuses specifically on the designation and recognition of the **West End International Centre**, and how Camden's revised Local Plan can align more fully with the strategic ambitions of the **London Plan** and the **London Growth Plan**.

HOLBA represents over 500 businesses and property owners in the 'Heart of London' area—one of the capital's most vital economic and cultural districts, covering Leicester Square, Piccadilly, Piccadilly Circus, St Martin's Lane and Haymarket. While our geographical footprint lies entirely within the City of Westminster, our membership and advocacy reflect the broader interests of the **West End**, which spans both Westminster and Camden boroughs.

#### 2. Economic and Cultural Importance of the West End

The West End is a unique, globally recognised hub of commerce, creativity, and culture:

- Generates over **£51 billion** in annual economic output<sup>1</sup>
- Supports over **650,000 jobs**<sup>2</sup>
- Welcomes **tens of millions of visitors annually**
- **£14 billion** from the evening and night time economy<sup>3</sup>
- Hosts major headquarters in sectors including retail, finance, defence, telecoms, manufacturing, and mining
- **£4.8 - £4.9 billion GVA** from the arts and culture sector

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<sup>1</sup> Source: New West End Company

<sup>2</sup> Source: Centre for London

<sup>3</sup> Source: Evening and Night time Vision, Strategy and Action Plan, Publica, 2023

These attributes make the West End an economic and cultural powerhouse. However, current planning frameworks—particularly in Camden—do not yet fully reflect its strategic importance.

### 3. The West End International Centre – A Call for Recognition

The London Plan designates the West End as one of only two **International Centres** in London (alongside Knightsbridge). It includes not just the core retail streets (Oxford Street, Regent Street, Bond Street), but also the broader **West End Retail and Leisure Special Policy Area (WERLSPA)**.

Yet, this designation is inconsistently reflected at borough level:

- **Westminster’s City Plan (2019)** recognises the WERLSPA but restricts the International Centre to a narrow retail core.
- **Camden’s Local Plan (2017)** omits the International Centre designation altogether, reclassifying key areas such as Covent Garden, Tottenham Court Road, and New Oxford Street as “CAZ Retail Clusters” or “Specialist Areas.”

This effectively downgrades vital cultural and commercial zones from their rightful status within a strategic International Centre to locally contained retail or policy areas. While we understand Camden’s current Local Plan predates the latest London Plan, the ongoing review presents an opportunity to correct this omission.

### 4. What We’re Asking For

HOLBA respectfully requests that Camden’s revised Local Plan:

1. **Incorporates the full boundary of the West End International Centre** as defined in the London Plan, including the WERLSPA.
2. **Aligns planning definitions with those in Westminster’s Plan**, ensuring a consistent cross-borough approach.
3. **Supports the reclassification of the West End as an International Centre for Commerce and Experiences (ICCE)** to reflect its full spectrum of economic activity.
4. **Commits to working with the GLA and Westminster** to establish a coordinated planning framework and delivery model for the West End.

### 5. Redesignating the West End: ICCE Model

HOLBA proposes a refreshed designation: **International Centre for Commerce and Experiences (ICCE)**. This better reflects the multifaceted nature of the West End’s economy, especially the rise of the global **experience economy**, now worth over **£300 billion** in the UK<sup>4</sup> and projected to grow significantly.

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<sup>4</sup> Heart of London Business Alliance: Unlocking the Experience Economy: Driving Growth in the West End; February 2025

Benefits of the ICCE designation include:

- More targeted and **area-specific policy**
- Enhanced **infrastructure planning**
- Improved **placemaking and public realm investment**
- Clearer zoning to **balance residential and commercial needs**
- Stronger support for London's positioning as a global capital of culture and creativity

## 6. Strategic Alignment and Cross-Borough Planning

A joined-up planning approach across boroughs is essential. Precedents already exist, notably the **Knightsbridge International Centre**, jointly managed by Westminster and Kensington & Chelsea.

HOLBA advocates for a similar model between **Westminster and Camden**, supported by the GLA. This would provide mutual benefit, policy coherence, and a unified platform for managing growth and public services across the West End.

## 7. Mission-Driven Delivery Models

Designation is only the first step. HOLBA recommends embedding **Mission Teams**—multi-agency bodies involving the boroughs, GLA, TfL, Met Police, and Business Improvement Districts—to translate planning frameworks into on-the-ground outcomes.

A West End Mission Team could focus initially on public safety, with a long-term agenda of service integration, placemaking, and inclusive economic development. This structure is critical to the success of the **London Growth Plan**.

## 8. Conclusion

Camden's Local Plan review provides a critical and timely opportunity to:

- **Fully recognise** Camden's share of the West End International Centre
- **Align** local planning designations with the London Plan and Growth Plan
- **Collaborate** with Westminster and the GLA to develop joint delivery mechanisms
- **Support** the evolution of the West End into an International Centre for Commerce and Experiences (ICCE)

These steps are not just administrative; they are vital for safeguarding London's status as a world-leading centre of commerce, culture, and experience.

HOLBA stands ready to partner with Camden Council, Westminster, and citywide agencies to help deliver this shared vision.

Date: Fri, 27 Jun 2025 14:41:47 +0000

From: Neil Wells

To: PlanningPolicy

Subject: London Borough of Camden: Draft New Camden Local Plan (Regulation 19) - Representations made on behalf of St George West London Limited

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]



Quod

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**St George West  
London Limited**

**Camden Local  
Plan Regulation**

**19**

**Representations**

Camden Goods Yard

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27<sup>TH</sup> JUNE 2025

Q210508

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# 1 Introduction

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## Executive Summary

1. Camden is in a housing emergency. The Council delivered 1 affordable home in 2022/2023; completed 30 homes in 2023; and there were only 60 housing starts in 2024<sup>1</sup>.
2. The Draft Submission Local Plan (Regulation 19) (June 2025) ('CLPRPSD') is not consistent with the Government's objectives of prioritising brownfield development, making sure targets are realistic and ensuring policies promote a presumption in favour of housing to contribute to the delivery of 1.5million homes.
3. A strategic objective of the CLPRPSD is to increase the supply of homes to meet existing and future needs with recognition that housing is vitally important to meet every aspect of people's lives. However, as drafted the CLPRPSD slashes housing targets. Over the past four years, only a third of Camden's housing target has been achieved (1,498 out of 4,152 homes) and only 20% of its affordable housing target (289 out of 1,412 homes).
4. Based on the Government's revised calculations, Camden is required to deliver 3,137 homes per year to contribute to meeting the housing emergency. Yet, instead of increasing targets to meet this challenge, the plan reduces the target to just 770 homes per year. This is 35% less than the 2017 target and only 25% of the target of 3,137 homes per year based on the Government's calculation method. Housing targets should be revised upwards to positively respond to this.
5. Housing delivery will be hampered by the unrealistic and onerous strategic objective that 50% of all homes should be affordable. This ignores the findings of the viability assessment prepared in support of the CLPRPSD that demonstrates that for the majority of scenarios, 35% is not a reasonable viable policy, let alone 50%. The CLPRPSD does not establish a deliverable affordable threshold, therefore affordable housing will have to be considered on a site by site basis taking into account viability. There is a critical need to deliver new homes in all tenures now.
6. Whilst the Government's objective is to be explicit in policy that the default answer to brownfield development should be yes, there remains 87 pages of planning policy relating to housing delivery compared to 40 pages for all other land uses. The housing policies remain substantially as per the 2017 Local Plan and no steps have been taken to streamline planning policy to accelerate housing delivery. A new approach with a presumption in favour of housing is required.
7. This is mirrored in site specific allocations, which are overly prescriptive and constrain delivery. For example, at Camden Goods Yard (C7), a highly sustainably located site within Camden Town Centre, the allocation has been revised to state "*should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including on-site affordable housing) to be maintained or increased*". This prejudices an applicant's ability to follow the viability tested route to ensure planning permissions are deliverable.

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<sup>1</sup> Q1 2025: MHCLG Starts / Completion Data

8. The CLPRPSD as drafted is unsound and has not been positively prepared. A fundamental review of its housing targets and policies is required.

## Strategic Considerations

- 1.1 Quod is instructed by St George West London Limited (“St George”) as part of the Berkeley Group to review and make representations to the London Borough of Camden (“the Council”) Draft Submission Local Plan (Regulation 19) (June 2025) (‘CLPRPSD’), which was published for consultation in May 2025 and remained open for comment until 27<sup>th</sup> June 2025.
- 1.2 St George welcomes the opportunity to continue to engage with the Local Plan process and provide representations to the CLPRPSD, and to assist the Council in preparing a sound plan. The comments enclosed should be read in the context of the comments submitted to the Site Allocations Review in January 2022, and the Regulation 18 consultation draft in March 2024.
- 1.3 We do not consider that the CLPRPSD is sound, as a whole, for the following procedural reasons and the conflict with national policy that arises.
  - 1.3.1 The CLPRPSD has not been positively prepared – and does not provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs in accordance with paragraph 62 of the National Planning Policy Framework (‘Framework’). The Secretary of State has made clear that there is a moral and professional obligation to build more homes.
  - 1.3.2 The CLPRPSD is not justified by an appropriate and proportionate evidence base. The Whole Plan Viability Assessment (2025) (‘WPVA’) is flawed and overstates development viability.
  - 1.3.3 The CLPRPSD is not effective and deliverable over the plan period. The poor record of housing delivery in the Borough requires a fundamental and revised plan to stimulate economic growth and housing delivery, yet the CLPRPSD simply repeats many of the policies from the Council’s 2017 adopted Local Plan (‘2017 Plan’). Despite annual housing delivery rates falling well short of minimum requirements, failure of the HDT and without a 5YHLS, the CLPRPSD is not drafted to address and respond to the historic, current and forecast housing emergency in the borough, one of the worst in London.
  - 1.3.4 The CLPRPSD is not consistent with national policy. It does not adopt the requirements of Annex 1: Implementation for the purposes of decision-making of the Framework, which requires plans submitted after the 12<sup>th</sup> March 2025 to apply policies of the Framework.
- 1.4 The CLPRPSD does not positively respond to the Prime Minister’s and Secretary of State’s challenge to get Britain building due to the economic, social and environmental benefits that arise from building more homes.
  - 1.4.1 Despite numerous statements within the CLPRPSD, including strategic objectives of increasing *‘the supply of homes to meet existing and future needs’* because *‘the Council recognises that housing is vitally important to nearly every aspect of people’s*

*lives and that everyone deserves a safe and affordable place they call home'*, the CLPRPSD seeks to deliver less homes up to 2041, than the current, and out of date, 2017 Plan. There is no sound or logical reason for this.

- 1.4.2 Despite there being a housing emergency, we can find no reference to the current housing needs of 3,137dpa for the borough within the CLPRPSD. Instead, the annual housing delivery target has been reduced from 1,038dpa to 770dpa; and its affordable housing delivery target from 353dpa to 200dpa.
- 1.4.3 The CLPRPSD does not consider why the 2017 Plan has resulted in failure to meet several of the Council's Annual Monitoring Report Indicators, particularly those related to housing. There is no self-assessment or self-reflection.
- 1.4.4 The CLPRPSD has not been prepared positively because it oversteps the 'aspirational' policy<sup>2</sup> objective and does not demonstrate deliverability. The use of a 50% affordable housing threshold, for example, is unrealistic and as evidenced in the WPVA, in nearly all cases it is simply not deliverable and is the absolute exception. Its inclusion, which is not supported by the WPVA, results in local communities and elected officials believing that it is deliverable, an expectation which delays the determination of planning applications which legitimately follow the Viability Tested Route.
- 1.4.5 For the Typologies 15<sup>3</sup> and 16<sup>4</sup> used in the WPVA which are most similar to the Camden Goods Yard site, only 31 of the 192 scenarios tested are shown to be viable (i.e. 16% of the total) at 50% when including the proposed policy costs; and only 58 of the 192 scenarios tested (i.e. 30% of the total) at the 35% target. But this assessment excludes abnormal / infrastructure costs, current day CIL rates, applies a single use typology and may not include BS9991 requirements which nearly every major residential site experiences, indicating that these low percentages are unlikely to be achieved.
- 1.4.6 Despite repeated requests to the Council<sup>5</sup>, the viability assessments which inform the WPVA have not been made available in full, with partial information not received until the 24<sup>th</sup> June (i.e. 3 days before close of the consultation). This approach is contrary to PPG Paragraph: 021 Reference ID: 10-021-20190509 that states any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances.
- 1.4.7 The CLPRPSD contains nearly 100 pages dedicated to 'Meeting Housing Needs' which largely remain unchanged from the 2017 Plan. The evidence of poor housing delivery in the borough demonstrates the current approach does not work, a full review of housing policy and streamlining policy to kickstart delivery is required.
- 1.4.8 At 580 pages overall, the CLPRPSD as drafted is a blocker to development and not a catalyst for delivery that positively responds to the needs of the borough. The

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<sup>2</sup> Framework paragraph 16 (b)

<sup>3</sup> T15 = 200 flats

<sup>4</sup> T16 = 575 flats

<sup>5</sup> See correspondence appended to these representations at Appendix 1

CLPRPSD proposes to add a greater burden on development through more onerous development control standards which do not exist in the London Plan or the Framework. The requirement for 100% dual aspect homes; housing from commercial; climate change obligations; prioritising the retention of existing buildings; the use of PVS; childcare facilities to support working families; affordable and specialist workspace; and affordable retail floorspace in addition to limited flexibility within the wording of the conditions will inevitably compound the delivery issues that the borough has faced since adopting the last plan.

1.4.9 It appears that an inconsistent approach has been applied to site allocations in respect to expectations regarding affordable housing (C7), in conflict with other plan policies e.g. H1 and H5, and the London Plan. The Council's proposed bespoke control at C7, not used for any of the other 70 site allocations should be deleted. The proposed wording "*should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including on-site affordable housing) to be maintained or increased*" is wholly inappropriate as it prejudices an applicant's ability to follow the viability tested route.

1.4.10 Unusually, the site allocations adopt building heights derived from a borough wide Building Heights Study, not building heights which have been approved through the planning application process using detailed townscape and heritage visual assessments. Where detailed planning permissions have been granted on sites, the approved building heights should be reflected in allocations. For allocation C7, 53m should be replaced with the approved 56m.

1.4.11 There is a significant gulf between the CLPRPSD and the Framework because it does not follow the required process. Significant revisions and time will be required to ensure the CLPRPSD is sound. Given, the National Development Management Policies (NDMPs) are due for publication this year, it appears that the Council would be better placed to pause this document and re-draft in accordance with National policy and its local housing needs.

1.5 Due to the significant concerns raised, we would welcome the opportunity for further discussions with the Council.

## 2 Representations

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- 2.1 Quod is instructed by St George West London Limited (“St George”) as part of the Berkeley Group to submit representations to the London Borough of Camden (“the Council”) Draft Submission Local Plan (Regulation 19) (June 2025) (‘CLPRPSD’), which was published for consultation in May 2025 and remains open for comment until 27<sup>th</sup> June 2025.

### Context

- 2.2 St George welcomes the opportunity to continue to engage with the Local Plan process and provide representations to the CLPRPSD. The comments enclosed should be read in the context of the comments submitted to the Site Allocations Review in January 2022, and the Regulation 18 consultation draft in March 2024.
- 2.3 St George submit these representations in the context of the Framework (February 2025) and the many written ministerial statements issued by the Rt Hon Sir Keir Starmer KCB KC MP; and the Rt Hon Angela Rayner, Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government Angela Rayner MP which carry significant weight, and a serious intent for the application of policy.

*If we have targets that tell us how many homes we need to build, we next need to make sure we are building in the right places. The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes.*

*There is no time to waste. It is time to get on with building 1.5 million homes<sup>6</sup>.*

- 2.4 The Council published the CLPRPSD in April 2025 for consultation which closed on Friday 27<sup>th</sup> June 2025.
- 2.5 St George would welcome the opportunity to discuss these comments in further detail with officers of the Council.

### London's Challenge

- 2.6 The Framework sets a new housing target of 88,000 new homes per year for London, a total of 880,000 over the new Plan's period. Given delivery in London has plummeted over recent years, this target is going to be challenging. Without significant change in how we are planning, designing and funding new development, London's housing market is going to continue to decline.
- 2.7 The housing crisis has become a housing emergency in London.

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<sup>6</sup> Angela Rayner Deputy Leader and Secretary of State for Housing, Communities and Local Government, Ministerial Statement, 30<sup>th</sup> July 2024

- London's boroughs are spending £4 million per day on temporary accommodation.
- One in every 21 children is living in temporary accommodation (1.4 child per school class).
- Local Authority finances are being severely eroded by the cost of managing this crisis therefore effecting other services and the councils' ability to operate.
- Housing delivery rates in London have been consistently falling since 2021 (based on the GLA datastore). It is acknowledged that this is a live dataset and therefore there are issues with accuracy however the trends being demonstrated are undeniable:
  - Completions have dropped from 38,764 homes per year in 2021/22 down to 5,303 homes in 2024/25 – **86% decline**
  - Starts have dropped from 41,964 in 2021/22 to 2,474 in 2024/25 – **94% decline**
  - Planning application approvals have also declined from 76,494 in 2021/22 to 36,675 in 2024/25 – **52% decline**<sup>7</sup>

2.8 Fewer applications are being brought forward and more sites that have already got planning permission are not able to start – therefore this trajectory is going to continue to plummet further deepening London's housing and homelessness crisis.

2.9 It is imperative that the next Camden Plan focuses on the challenges facing housing delivery, and all policies are prepared with delivering for Camden as their central focus.

## Camden Goods Yard

2.10 St George is currently developing the Camden Goods Yard site located on Chalk Farm Road, NW1 8EH (the 'Site'). The Site area comprises 3.26ha.

2.11 Detailed planning permission was first granted for redevelopment of the Site on 15th June 2018. Following the grant of planning permission, St George commenced delivery of the original permission and has invested very significantly in the Site to date.

2.12 It has cleared buildings from the main site, demolished the PFS, constructed a temporary Morrisons store, and is currently constructing Building A (110 private homes), Building B (108 private homes and 60 affordable homes), a new Morrisons Supermarket (19,963 sqm GEA) and 3,563sqm (GEA) of offices, 179sqm (GEA) of workspace and 84sqm (GEA) of affordable workspace, and 359sqm (GEA) of retail floorspace; and urban farm (1,435sqm GEA). This is known as Phase 1.

2.13 St George's redevelopment proposals for the Site provide an excellent opportunity to assist the Council with significant housing delivery and employment growth and regeneration as well as addressing some of the key issues that it is facing across the borough.

## Soundness<sup>8</sup>

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<sup>7</sup> Many of these planning permissions will be revised applications due to new building regulation to address fire safety rather than new sites. Therefore, as a measure of future pipeline of delivery this metric is likely to be lower.

<sup>8</sup> Framework paragraph 36

2.14 As a whole, we do not consider that the CLPRPSD is sound for the following reasons:-

- 2.14.1 It has not been **positively prepared** – and does not provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs in accordance with paragraph 62 of the Framework.
- 2.14.2 It is not **justified** as appropriate strategy and is based on a flawed Whole Plan Viability Assessment (2025) which overstates viability and is not a proportionate evidence base.
- 2.14.3 It is not **effective** and deliverable over the plan period. The poor record of housing delivery in the borough requires a fundamental and revised plan to stimulate economic growth and housing delivery, yet the CLPRPSD simply repeats many of the policies of the 2017 Plan, but also adds more development control policies. Given annual housing delivery rates falling well short of minimum requirements, failure of the HDT and without a 5YHLS, the CLPRPSD is not drafted to address and respond to the shortfall in housing delivery.
- 2.14.4 It is not **consistent with national policy**. It appears to have ignored Annex 1: Implementation 'For the purposes of decision-making of the Framework', which requires plans submitted after the 12<sup>th</sup> March 2025 to apply policies of the Framework. It has failed to determine the minimum number of homes needed, informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.

2.15 The CLPRPSD also fails to address other requirements of the Framework<sup>9</sup>.

- 2.15.1 It is not prepared positively, because it oversteps the '*aspirational*' policy objective. The use of a 50% affordable threshold, for example, is misleading as in the majority of cases it is not deliverable, and is the absolute exception. Its inclusion, not supported by the evidence, results in local communities and elected officials believing it is deliverable and an expectation which delays the determination of planning applications which legitimately follow the Viability Tested Route.
- 2.15.2 It does not contain policies that are clearly written and unambiguous. It is not evident how a decision maker should react to development proposals because there are so many obligations placed on development.
- 2.15.3 The CLPRPSD also contains inconsistent applications of affordable housing and tall building policies within the site allocations which contradict other policies of the CLPRPSD, and the London Plan and Framework.

## Approach to meeting housing needs (Section 7: Policy H1, H2, H4, H6, H10)

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<sup>9</sup> Framework paragraph 16



- 2.16 Chapter 7 Meeting Housing Needs states that *'The Council recognises that housing is vitally important to nearly every aspect of people's lives and that everyone deserves a safe and affordable place they call home'*<sup>10</sup>.
- 2.17 However, these statements could be considered misleading as the CLPRPSD adopts a minimum housing figure of only 11,550 additional homes over the plan period to 2041, equivalent to just 770 homes per annum. It explains that this is a 'capacity figure'<sup>11</sup> drawn from the (now dated) London Plan SHLAA 2017.
- 'The Local Plan aims to deliver 11,550 additional homes (770 homes per year) in Camden over the Plan period 2026/27 to 2040/41. This target has been derived in accordance with the guidance in the London Plan, and includes the final three years of Camden's target for 2019/20 to 2028/29 from the London Plan, plus the anticipated backlog against this target at the start of the Local Plan period. ... The Council recognises that work has commenced on review of the London Plan 2021 with a view to its replacement in 2027, and the replacement London Plan will set a new housing target for Camden'*<sup>12</sup>.
- 2.18 This approach fundamentally misses an opportunity to meet the housing needs of Camden and doesn't seek to meet the capacity needs of the London Plan.
- 2.19 It is extremely disappointing that the CLPRPSD fails to respond to written ministerial statements by the Prime Minister and the Secretary of State, which encourage the delivery of new homes 'now' to stimulate and accelerate economic growth to address the national housing crisis and the one that is manifest in Camden. The Secretary of State has made clear that there is a moral and professional obligation to build more homes.
- 2.20 The Framework (adopted December 2024, updated February 2025) requires local plans submitted at Regulation 19 stage after the 12<sup>th</sup> March 2025 to follow national policy set out in the new Framework.
- 2.21 To be sound, local plans must be positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs informed by a local housing need assessment, conducted using the standard method in national planning practice guidance (Framework paragraph 36 and 62).
- 2.22 It is unclear why the CLPRPSD ignores and does not positively respond to Government policy.
- 2.23 One of the principal aims of national policy is to deliver housing to meet local needs, and in this regard, the government published local standard method housing needs in December 2024.
- 2.24 Despite numerous statements within the CLPRPSD, including strategic objectives of increasing *'the supply of homes to meet existing and future needs'* because *'the Council recognises that housing is vitally important to nearly every aspect of people's lives and that*

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<sup>10</sup> CLPPSD, paragraph 7.1

<sup>11</sup> CLPPSD, paragraph 2.8 and 2.9

<sup>12</sup> CLPPSD, paragraph 7.7



*everyone deserves a safe and affordable place they call home'*, the CLPRPSD pursues an approach which seeks to deliver less homes up to 2041, than the current, and out of date, 2017 Plan.

2.25 We set out the Council's approach to housing delivery in Table 1.1 below.

Table 1-1: Camden Housing Needs Summary

Document	Date	Dwellings per annum	Period
Camden Local Plan (total)	2017	1,092 - 1,176	2031 <sup>13</sup>
Camden Local Plan (affordable)	2017	353	2031
London Plan	2021	1,038	Up to 2028/29
Government Standard Method	2024	3,137	Now
CLPRPSD (total)	2025	770	2041
CLPRPSD (affordable)	2025	200	2041
Camden total homes average delivery (HDT)	2024	513 (average) – 53%	2020/21 – 2022/23
Camden affordable housing delivery (AMR)	2023	79 (average)	2020/21 – 2022/23
5YHLS	2023	Fail	

2.26 Table 1.1 demonstrates a consistent trend of high levels of housing need, rising year on year, yet low levels of supply, with an ever widening gap.

2.27 The Council is proposing to reduce its annual housing delivery from 1,038dpa to 770dpa; and its affordable housing delivery from 353dpa to 200dpa.

2.28 This despite housing needs in the borough manifestly increasing and acute, poor housing delivery, no evidence of a 5-year housing land supply and failure of the Housing Delivery Test.

2.29 It is disappointing that at 580 pages, including c.70 site allocations, the CLPRPSD has not been able to positively respond to the change in housing needs and under-delivery in the borough.

2.30 Indeed, we note that many of the strategic policies of the CLPRPSD (outwith the site allocations) have not changed materially since the 2017 Plan, other than largely to add more burden.

2.31 This suggests that the housing delivery constraints applied by the 2017 Plan will remain, and worsen.

<sup>13</sup> 1,176 additional homes for the period 2016/17 to 2020/21, and an annual target of 1,092 for the period 2021/22 to 2030/31.

2.32 In our opinion, the CLPRPSD has not been positively prepared to facilitate a step change in housing delivery, and that further burdens (which did not exist in 2017) will now be placed on development.

2.33 Since 2018 there have been significant changes in development economics nationally, and in the Borough due to regulatory changes and other matters including build cost inflation; Part L energy / carbon; Part F & O ventilation; Part S electric car charging; Part B 2nd stair and fire safety; Part P electrical safety; 2nd stair efficiency; finance costs, taxation increases and net zero carbon contributions.

2.34 CIL indexation in the borough has increased significantly and the Building Safety Levy has been introduced as set out below.

Zone B CIL	Camden CIL	Mayoral CIL	Building Safety Levy	Total	Year
No indexation	322	80	43.56	445.56	2020
Indexation (2025)				526.16	2025

2.35 These factors, in addition to restrictive development control policies, have contributed to a decrease in housebuilding, and a decrease in the delivery of affordable housing.

2.36 Annually, housing delivery in Camden has been poor, as summarised in Table 1-2 below.

Table 1-2: Camden Housing Delivery

Year	Camden Housing Delivery <sup>14</sup>	Minimum Target	%
2024/25	11 <sup>15</sup>	1,038	1%
2023/24	591 <sup>16</sup>	1,038	57%
2022/23	364 <sup>17</sup>	1,038	34%
2021/22	532 <sup>18</sup>	1,038	52%

2.37 The Council's affordable housing completions are summarised in AMR Table 5, which is replicated below.

Table 1-3: Camden Affordable Housing Delivery Deficit<sup>19</sup>

Year	Camden Housing Delivery	Minimum Target	%
2024/25	0 <sup>20</sup>	353	0%

<sup>14</sup> Government Housing Delivery Test Results

<sup>15</sup> GLA London Data Hub

<sup>16</sup> GLA London Data Hub

<sup>17</sup> AMR Table 4

<sup>18</sup> AMR Table 4

<sup>19</sup> AMR Table 5 (up to 2022/23)

<sup>20</sup> GLA London Data Hub

Year	Camden Housing Delivery	Minimum Target	%
2023/24	168 <sup>21</sup>	353	48%
2022/23	1	353	0%
2021/22	120	353	34%

- 2.38 We note that the Council's AMR records the delivery of 1 affordable home in the borough in 2022/23, and an average of just 79 homes per year for the last 3 year AMR period, which is extremely concerning.
- 2.39 The outcomes set out above, point to the need for radical reform; a flexible approach to the preparation of policy to reflect historic, current and forecast delivery trends; and an application of policies flexibly by the Council when the policy requires it at application stage.
- 2.40 Yet despite these trends, the CLPRPSD does not reflect, consider and address the reasons why the Council has failed to achieve several of its Annual Monitoring Indicators, particularly for housing.
- 2.41 The housing needs of the borough should be the starting point for plan preparation, and the policies and site allocations should react to those needs. Policy H1 requires redrafting, and should adopt the standard methodology of housing need.**

### Whole Plan Viability Assessment (2025)

- 2.42 The Mayor of London's Accelerated Housing PGN recognises the impact of significant build cost inflation, registered provider and financial constraints and therefore it is surprising that that the Council's Whole Plan Viability Assessment ('WPVA') (April 2025) has not responded to these issues and continues to follow a format which fails to meet NPPG, and has the unintended consequence of supporting a 50% affordable housing which is clearly not deliverable.
- 2.43 There remain serious omissions in the WPVA which should be rectified, and we discuss these further in the following section.
- 2.44 Given the significant divergence from the 50% affordable threshold promoted by the CLPRPSD we consider that the threshold of 50% in Policy H4 should be revised. We recognise that the Framework expects plans to be '*be prepared positively, in a way that is aspirational but deliverable*'<sup>22</sup>, but there is no evidence to support a 50% threshold as a deliverable and sound threshold, resulting in it being a misleading figure when included in a local plan.**

### Site Allocation C7 – Morrisons Supermarket

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<sup>21</sup> GLA London Data Hub.

<sup>22</sup> Framework paragraph 16 (b)

- 2.45 The CLPRPSD takes an inconsistent approach at site allocation C7, seeking to impose new requirements which are inconsistent with Policy H1, H4, the London Plan and Framework.
- 2.46 Within the context section, it requires the following.

*This site will make a significant contribution to the Council's housing supply, with the permitted schemes (2017/3847/P and 2022/3646/P) delivering 644 homes. Should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including the on-site affordable housing) to be maintained or increased and the key benefits for the wider area to be delivered.*

- 2.47 There is no justification to insert the requirement which states that 'Should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including the on-site affordable housing) to be maintained or increased and the key benefits for the wider area to be delivered'. This prejudices an applicant's ability to follow the viability tested route and conflicts with national policy. It also suggests that pre-application discussions may have indirectly informed the site allocation wording; and we are not aware of this wording being included for any of the other 70 site allocations.
- 2.48 The development and design principles require the following:-

*The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m – 53 m considered the potentially appropriate height range. 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. The Council has granted planning permission for a development of up to 56m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development.*

- 2.49 The approach for C7 is inconsistent. It is not effective to seek building heights (12m – 53m), derived from a borough wide assessment that are below, and less than, the heights derived from a detailed townscape, heritage and visual assessment that considered 56m appropriate. This is illogical, particularly as the remainder of the allocation and plan seeks to secure benefits. The approach simply adds further constraints to development.
- 2.50 **Site allocation C7 should be revised to remove text related to maintaining or increasing housing and affordable housing. The appropriate height should be revised to 56m. Detailed amendments are proposed at Appendix 2.**

## **Site Allocation C8 – Former Morrisons Supermarket PFS**

- 2.51 The CLPRPSD allocates the C8 for 'Permanent self-contained homes; employment (offices), retail, food and drink'. As a town centre site, the site should be considered appropriate for all living uses including self-contained housing, student accommodation (H9), as per the adjacent C9 site which includes these uses and housing with shared facilities (H10), BTR and Co-Living.
- 2.52 **Site allocation C8 should be revised to include all living uses including student accommodation (H9) and housing with shared facilities (H10), and include all town**

centre uses. It should not therefore be prescriptive beyond ‘living and town centre uses’. Detailed amendments are proposed at Appendix 3

## Camden Goods Yard Planning Framework Supplementary Planning Document (SPD)

- 2.53 The CLPRPSD refers to the Council's Camden Goods Yard Planning Framework Supplementary Planning Document (SPD), July 2017.
- 2.54 Policy C1 Camden Town requires ‘*development coming forward in this location to be taken forward in accordance with the Camden Goods Yard Planning Framework*’.
- 2.55 Site allocations expect ‘*Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site*’.
- 2.56 The SPD is nearly 10 years old, and was produced in a fundamentally different time, under a different London Plan, Framework and objectively assessed needs. It was also produced prior to the recent grants of planning permission. It therefore carries limited weight and should not be relied upon in a new Local Plan.
- 2.57 **The CLPRPSD should either draw out specifically which ‘visions and objectives’ should be regarded, or the SPD should be formally updated or the reference deleted.**

## Policy H2

- 2.58 Policy H2 promotes the inclusion of ‘*permanent self-contained housing as part of a mix of uses*’. It is unclear how effective the word ‘*permanent*’ is.
- 2.59 To understand the effectiveness of this policy, the Council should produce evidence to inform the local plan review, as to how many homes are delivered.
- 2.60 Policy H1 supports other forms of housing, and recognises (7.15) the following.
- ‘In recent years, the market in Camden has been unable to deliver the numbers of homes envisaged by the Camden Local Plan 2017 or the London Plan 2021. Given challenging market conditions for housebuilders and the flow of investment towards rental products that deliver a long-term revenue stream, the Council recognises that diversity of housing supply is necessary to maximise housing delivery, and that this may involve more particular forms of housing, some of which are not self-contained’.*
- 2.61 Given the Council's poor housing delivery record, it appears ineffective to retain Policy H2, and apply restrictive ‘*Permanent self-contained homes*’ objectives for site allocations, to secure more affordable housing and control student housing, particularly where the policies might indirectly constrain housing delivery, or result in housing needs not being met.
- 2.62 The London Plan (4.1.9) recognises that non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Net non-self-contained accommodation for older people (C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained

communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.

- 2.63 In the case of a housing emergency, it would be appropriate to secure and maximise any form of housing if it contributes to overall needs. Policy H2 should be deleted.**

## 3 Whole Plan Viability Assessment

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3.1 The Council updated its 2015 WPVA this year to support the CLPRPSD.

### Overall Policy Requirement

3.2 The Whole Plan Viability Assessment 2025 ('WPVA') confirms that *'Although a number of the development scenarios tested could viably support the full strategic affordable housing policy target, our appraisals indicate that there are significant variations in the percentages of affordable housing that can be provided depending on private sales values, scheme composition and benchmark land value'<sup>23</sup>.*

3.3 For Typologies 15 and 16 which are most similar to the Camden Goods Yard site the *"significant variations"* referred to above do in fact show that the proposed strategic target of 50% affordable homes and Fast Track threshold of 35% affordable homes are entirely unrealistic:

- At the 50% target only 31 of the 192 scenarios tested are shown to be viable (i.e. 16% of the total) when including the proposed policy costs.
- At the 35% target only 58 of the 192 scenarios tested are shown to be viable (i.e. 30% of the total) when including the proposed policy costs.

3.4 Even at the highest value tested (Zone B - £1,300/ft<sup>2</sup>) and lowest BLV (i.e. the most optimistic scenario) the typologies most similar to Camden Goods Yard indicate that only 25% and 15% (Typologies 15 and 16, respectively) affordable housing are viable before any abnormal / infrastructure costs.

3.5 Given the above the testing clearly indicates that the proposed affordable housing policy does not meet the requirements of PPG Paragraph: 002 Reference ID: 10-002-20190509 which indicates that:

*"Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."*

3.6 Instead, the unrealistic policy requirements ensure that viability assessment will be required at the decision making stage for the majority of sites, slowing development and adding risk and uncertainty to the process.

**3.7 The proposed affordable housing policies should be amended and set at a level where development is deliverable. This will be below 35% and 50% respectively.**

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<sup>23</sup> WPVA, paragraph 7.6



## Testing of Strategic Sites

- 3.8 The WPVA refers to Camden Goods Yard as one of only two current and emerging significant developments in the Borough. The other comprises a redevelopment of retail floorspace for new homes and new replacement retail. Despite this, the WPVA does not test either scheme (as NPPG expects it to) and does not include a mixed use typology of residential & retail uses, favouring a single use typology of 575 homes (No.16) instead.
- 3.9 As a result of the failure to individually test strategic sites, key characteristics of these sites are omitted from the viability testing. This includes site-specific benchmark land values and infrastructure costs. The approach taken by BNPP does not meet the requirements of PPG Paragraph: 005 Reference ID: 10-005-20180724 which states:

*Why should strategic sites be assessed for viability in plan making?*

*It is important to consider the specific circumstances of strategic sites. Planmakers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan. This could include, for example, large sites, sites that provide a significant proportion of planned supply, sites that enable or unlock other development sites or sites within priority regeneration areas*

- 3.10 The Camden Goods Yard site is clearly critical to delivering the strategic priorities of the plan, being one of only two such sites in the borough. It is also the largest part of a priority regeneration area, this being the wider Camden Goods Yard area incorporating the adjacent estate regeneration site being brought forward by Riverside Housing. The success of the regeneration as a whole is reliant on the delivery of the St George site.
- 3.11 New viability testing should be undertaken assessing strategic sites separately and an affordable housing policy for such sites should be included based on evidence.**

## Transparency of the Viability Evidence Base

- 3.12 The WPVA appends extensive outputs from viability testing undertaken by BNPP but excludes the appraisals themselves (i.e. the calculations which create the outputs). This approach makes it impossible for landowners and developers to fully understand the work undertaken and therefore engage in it fully. Quod requested the supporting development appraisal for the typology most relevant to Camden Goods Yard on the 6<sup>th</sup> June 2025. The information was eventually partially provided on the 24<sup>th</sup> June, with a PDF appraisal summary. Whilst helpful, this still did not include the quantities, rates and calculations.
- 3.13 It is also noted that the WPVA appraisal provided appears to differ from the main body of the WPVA. For example, paragraph 4.56 of the WPVA refers to a mix of off-plan and post-completion sales and a sales rate of 8 homes per month. However, the appraisal provided indicates 100% of homes are sold prior to completion. This understates finance costs. Provision of the full appraisal detail would enable understanding of the WPVA approach and may result in further queries.
- 3.14 The withholding of the viability assessments is contrary to PPG Paragraph: 021 Reference ID: 10-021-20190509 which indicates that:



*Should a viability assessment be publicly available?*

*Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances.*

- 3.15 The viability appraisals should be shared in full and further engagement undertaken with landowners and developers once access to this information is provided.**

## **Appraisal Inputs**

- 3.16 The WPVA's assessment of the current day base scenario (removing growth as required by recent appeal decisions APP/E5900/W/24/3356375 dated 29th May 2025; and APP/L5810/W/24/3339060 dated 2nd May 2025) is welcomed as is an assessment of Base Build Costs, Access Part M4(2), Building Safety Levy, S106, CIL<sup>24</sup>, Building Regs 2022 & Staircases, Wheelchair chair Part M4(3), BREEAM Excellent, Biodiversity, Renewable Offset Payments, Sustainability & Embodied Carbon. It isn't yet clear if all Fire Safety requirements have been considered albeit reference is made to 'second stairs'. There is no specific reference to BS9991, that was introduced in November 2024, which is estimated to reduce building efficiencies by a further 1-2%, equivalent to c.£7m on the relevant typology.
- 3.17 Paragraph 4.61 to 4.62 of the WPVA confirms that exceptional / abnormal costs are excluded from the study. The rationale for this is that (i) these costs are unknown (ii) they should not be applied as a blanket assumption to all sites and (iii) they should be reflected in the price paid for land / benchmark land value.
- 3.18 With regard to points (i) and (ii) above, it is clearly essential to include an estimate of relevant costs in a site-specific assessment of viability for strategic developments (which as noted at paragraphs 3.8-3.11 above must be tested in a local plan viability assessment). The abnormal costs for Camden Goods Yard are available in the application documents supporting the site (Application Reference 2025/0939/P) and should be reflected in the WPVA.
- 3.19 With regard to point (iii) above, BNPP's suggestion is that based on PPG guidance any scale of abnormal costs can simply be ignored, stating that "*benchmark land values should be adjusted for exceptional costs, which in effect means they have a neutral impact*". This approach does not reflect the requirements of PPG which indicates two clear steps in assessing land value:

Paragraph: 015 Reference ID: 10-015-20190509 indicates that "*Existing use value (EUV) is the first component of calculating benchmark land value*"

Paragraph: 016 Reference ID: 10-016-20190509 indicates that "*The premium (or the 'plus' in EUV+) is the second component of benchmark land value. It is the amount above existing use value (EUV) that goes to the landowner*"

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<sup>24</sup> The WPVA uses dated Camden and MCIL CIL rates from 2023 (with indexation), and should be updated to 2025 indexation.

- 3.20 Paragraph 016 makes clear that the premium can only add to not detract from the existing use value which must always be the minimum return to a landowner. Abnormal and infrastructure costs are to be had regard to but there is no requirement to deduct these from the BLV.
- 3.21 Similarly there is no suggestion that at plan making stage consideration of abnormal costs overrides the central requirement that the BLV provides a reasonable incentive to bring land forward for development. This is a logical position as to do otherwise (as BNPP suggest) would mean setting policy requirements which inherently do not allow the existing use value to be met or provide an incentive to release land for development. This is clearly illogical.
- 3.22 The proposed developers return of a fixed 17.5% profit on gross development value for market homes is unrealistic, particularly for strategic sites with longer timescales, more up-front costs and greater risk profile. Whilst PPG indicates that 15-20% of gross development value may be an appropriate return it also indicates (Paragraph: 018 Reference ID: 10-018-20190509) that it may be varied based on evidence including the type, scale and risk profile of development. This is particularly relevant for strategic sites where a time based return measure such as Internal Rate of Return (IRR) is more appropriate. GLA recognises within the Affordable Housing and Viability SPG (2017) that IRR may be relevant to schemes with a long-term development programme (paragraph 3.36). RICS guidance supports the use of IRR and within Assessing Viability in Planning under the NPPF (2021) confirms that this should not be expected to produce the same result as a profit on GDV.
- 3.23 Given the scale, long term risk profile and high up-front costs of Camden Goods Yard and other strategic sites it is appropriate to use IRR as the key measure. This is particularly relevant as factors such as the Building Safety Act Gateway 2 have added 12 months + to a typical development block, meaning that the return on capital employed has substantially reduced if adopting a fixed profit on GDV.
- 3.24 The assumed finance rate of 6.5%, is not reflective of current and future forecast market conditions. As of 12th June 2025, the base rate is at 4.25%, which equates to a margin of 2.25% for a finance rate of 6.5%.
- 3.25 As can be seen within the table below, finance rates in excess of 7% are being agreed in London and are a much better reflection of current market conditions. As such a finance rate of 7% - 8% would be more appropriate assumption within the local plan viability study and would subsequently impact the viability of a number of scenarios.

Scheme	Date	Agreed Finance Rate
Friars Close, Bear Lane, Southwark	July 2024	7.5%
Colebrook Court, 75 Sloane Avenue, RBKC	July 2024	8.5%
Bridge House, Bridge Close, North Kensington, RBKC	July 2024	7.5%
28-34 Queensway & Olympia Mews, Westminster	Sept 2023	9.5%
Highwood Farm, Stortford Road, Great Dunmow, Uttlesford	Sept 2023	8.25%
66-68 London Road, Tooting, Merton	July 2023	9.50%

Scheme	Date	Agreed Finance Rate
32-44 Keeley Road & 31-57 Drummond Road (‘Citiscap’), Croydon	March 2023	7-8.5%

3.26 It is also noted that a full FVA was submitted with the recent application for Camden Goods Yard (planning ref 2025/0939/P) evidencing that the proposed 15% affordable homes is in excess of the maximum viable level. This broadly aligns with BNPP’s testing indicating c.10% affordable housing is viable (albeit over-stating viability for the reasons above).

**3.27 The affordable housing policy applicable to Camden Goods Yard should be amended to reflect the evidence, in line with PPG requirements.**

## 4 Other Representations

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4.1 This section of our representations considers other policies of the CLPRPSD.

### Site optimisation to deliver housing

4.2 Chapter 7 of the CLPRPSD refers to appropriate density under paragraph 7.31. It states:

“Taking account of the Sustainable Residential Quality [SRQ] density matrix in the London Plan 2016, the Camden Local Plan 2017 indicated that densities of new self-contained homes should generally be between 45 dwellings per hectare (in areas of existing low density or lower public transport accessibility) and 405 dwellings per hectare (in areas of existing high density or higher public transport accessibility). This range continues to be appropriate as a broad guideline, but the Council recognises that lower or higher densities may be justified in some contexts.”

4.3 The approach to density within the CLPRPSD has therefore not been reviewed. It continues to rely on outdated density ranges drawn from the London Plan 2016 Density Matrix. This matrix was removed with the publication of the London Plan 2021, and considered to be a constraint on delivery. The Panel Report supported this departure on the basis that continued use of the matrix “*would fundamentally conflict with the design-led approach now advocated [London Plan 2021], which bases density on local context, infrastructure capacity and connectivity.*”<sup>25</sup>

4.4 Further evidence from the London Plan found that “*The majority of approved developments in London have been delivered at densities beyond those recommended in the SRQ density matrix for every year since the commencement of the London Plan in 2004.*”<sup>26</sup>

4.5 The continued reference to the 2016 density matrix is therefore inconsistent with the Strategic Development Plan and fails the test of soundness in not being effective, positively prepared or justified. In relying on a matrix that the London Plan 2021 has purposefully moved away from, the CLPRPSD is arguably failing the legal test set out in section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 (as amended) in not being in general conformity with the spatial development strategy (the London Plan 2021).

**4.6 Reference to the Sustainable Residential Quality [SRQ] density matrix in the London Plan 2016 should be deleted.**

### Design – D1

4.7 Policy D1, Part C 2.) states that where public spaces are provided as part of developments the Council will require that these spaces ‘*celebrate and reflect the diversity of the communities they are within through high quality interpretation, events, public art and decorative features codedigned with local people*’. We are concern that this is ambiguous and it is unclear how this

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<sup>25</sup> Paragraph 280 - *London Plan Examination in Public: Panel Report October 2019*

<sup>26</sup> Paragraph 2.2 - *London Plan 2017 Topic Paper - Housing Density*

would work in practice. It is not considered necessary and should be revised to similar requirements under the same policy, stating “where appropriate”.

- 4.8 Part C 3.) states that spaces within developments should ‘*incorporate outdoor seating, sheltered rest places, quiet spaces, street furniture, boundary treatments, lighting and signage, where appropriate. This should be well designed and sensitively located, to make a positive contribution to the character and distinctiveness of the area*’. We are concerned that this policy might conflict with Secure by Design principles. The wording should be revised to “where appropriate”.
- 4.9 Draft supporting Paragraph 12.12 refers to the use of architect retention clauses in legal agreements where appropriate. The retention of the architect by a developer post planning is driven by a number of factors. It should not be a decision for the local planning authority to unreasonably request the retention of architects who may not perform to the standard expected, and/or at reasonable cost and experience. The purpose is to ensure design quality which is controlled through the use of detailed design related conditions and should be removed.

### Dual Aspect – D3

- 4.10 CLPRPSD Policy D3 requires all new homes to be dual aspect. This rigid and mechanistic requirement is inconsistent with London Plan Policy D6 which seeks optimisation and risks unnecessarily constraining development, especially on complex urban sites.
- 4.11 Policy D3 Part A.3 states: *“Expect all new homes to be dual aspect”*
- 4.12 Requiring 100% dual aspect homes is overly prescriptive. It limits flexibility in site layout and massing, often leading to inefficient use of space and reduced viability, particularly in dense or constrained settings.
- 4.13 The GLA’s Accelerating Housing Delivery Planning and Housing Practice Note (Dec 2024) promotes a more flexible approach. It builds on the 2023 Housing Design Standards London Plan Guidance (HDS LPG), which supports balanced design decisions aligned with London Plan Policy D6.
- 4.14 The HDS LPG explicitly warns against applying dual aspect standards mechanistically, particularly where it conflicts with the goals of optimising site capacity (Policy D3) and delivering affordable housing (Policy H4).
- 4.15 Paragraph 9.3 of the HDS LPG states:
- “standard C4.1<sup>27</sup> 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*

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<sup>27</sup> Housing Design Standards London Plan Guidance (HDS LPG)

*according to the specifics of each site, the design rationale for their use and the impact on key objectives.”*

- 4.16 The CLPRPSD should adopt this same flexible approach, aligning with established London Plan guidance to support deliverability and housing targets, and remove this requirement.

## **Tall Buildings – D2**

- 4.17 CLPRPSD Policy D2 on Tall Buildings should reflect the Borough’s acute housing need, Camden’s central London location, the general scarcity of land, and the potential for borough-wide development and intensification—particularly on brownfield sites undergoing redevelopment. The approach to appropriate building heights should be based upon recent permissions, not the borough wide building heights assessment, supported by flexible text which recognises that taller buildings may be appropriate if justified, and the appropriate heights are a guideline rather than a fixed cap.

## **Delivering Healthy and Sustainable Development – DS1**

- 4.18 CLPRPSD Policy DS1 part (b) and paragraph 2.37 requires major applications to contribute financially to Camden’s Citizen Scientist community research programme. No detail is given on what these contributions would be, or their accountability. This policy will place a further burden on developments that are already struggling with viability.
- 4.19 It is also not clear how this could be considered to reasonably meet the Framework tests for planning obligations, as being necessary to mitigate development. Accordingly, it is considered that paragraph 2.37 should be removed.

## **Repurposing, Refurbishment and Re-use of Existing Buildings – CC2**

- 4.20 CLPRPSD Policy CC2, Prioritising the Retention of Existing Buildings, imposes stricter requirements than current policy requirements. It requires both a condition and feasibility assessment and a thorough review of all alternative uses, regardless of the site’s specific limitations.
- 4.21 Part C1 recognises that major structural issues may justify demolition. In such cases, proposals involving significant demolition should not be required to undergo a full development options appraisal. The policy should explicitly state this exception.
- 4.22 Part C2 fails to consider scenarios where options like retrofitting or substantial refurbishment are not practically achievable, including when they are financially unviable.
- 4.23 The policy and supporting paragraphs should explicitly acknowledge financial viability. Many reuse strategies involve complex, expensive work. Requiring a full investigation of all potential reuse scenarios is resource-intensive and could hinder otherwise viable projects.
- 4.24 Whilst the benefits of reusing buildings over demolition in terms of resource use are acknowledged, in many instances retrofit is not feasible or practicable. It is often harder or impossible for existing buildings to meet energy and sustainability targets and as such demolition and construction of a new building can often be more sustainable in the long term.

- 4.25 St George always assess the most appropriate option for existing structure retention or demolition subject to each development's circumstances and feasibility.

#### **Open Space – SC4**

- 4.26 CLPRPSD Policy SC4 sets out the provision required for public open space. For residential development, the policy proposes 9sqm of open space per occupier, regardless of unit type or location. Applied to Camden Goods Yard, this equates to a requirement of approximately 11,000sqm of public open space.
- 4.27 This quantum is onerous, particularly in constrained urban regeneration sites, where efficient land use is critical to delivery of housing targets. The blanket application of a per-occupier metric, without flexibility for site-specific circumstances, risks undermining scheme viability and discouraging optimal use of brownfield land.
- 4.28 Policy SC4 be revised to allow a more flexible, context-led approach to open space provision.

#### **Site optimisation of supermarket sites**

- 4.29 Supermarket sites are complex brownfield sites due to their existing high value use and retail trading operations which often means that it is difficult to achieve redevelopment without complex phased development which does not prejudice the retail operation. This means that it is not always clear what constraints to development might arise which results in uncertainty and financial risk. Consequently, the precise nature, scale and cost of works required to facilitate redevelopment can fluctuate during the trading and temporary trading period.
- 4.30 Nevertheless, the London Plan recognises the significant opportunity that exists at lower density supermarket sites, to help meet the commercial and housing needs of Londoners.
- 4.31 Principal housing policy LP Policy H1 (Increasing Housing Supply) requires Councils to optimise the potential for housing delivery and lists six strategic sources of future supply. Two of the sources set out at Part B2 (a and b) of the policy directly relate to the characteristics of the Appeal Site. The policy refers to locations with existing or planned public transport access levels of 3 to 6 which are located within 800m distance of a station or a town centre. The Appeal Site benefits from a public transport within this range and is located within a designated town centre. Part B2(b) seeks the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. The characteristics of the site meet each of these policy criteria.
- 4.32 LP Policy SD6 (Town Centres and High Streets) seeks to promote the vitality and viability of London's varied town centres by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses and residential uses; identifying locations for mixed-use or housing-led intensification to optimise residential growth potential; and the potential for new housing within and on the edges of town centres should be realised through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.
- 4.33 LP Policy SD7 (Town Centre Development Principles and Development Plan Documents) considers the strategic intensification of London's town centres. The principles of Part C of the



policy should be applied which require Councils to identify suitable sites for higher density mixed use residential intensification capitalising on the sustainability advantages of the availability of services within walking and cycling distance and current and future public transport provision. It requires development plans to recognise the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment. The policy provides specific examples of suitable sites and refers specifically to the comprehensive redevelopment of low-density supermarket sites, surface car parks and edge of centre retail parks<sup>28</sup> and the redevelopment of town centre shopping frontages that are surplus to demand<sup>29</sup>.

- 4.34 LP Policy E9 (Retail, Markets and Hot Food Takeaways) encourages comprehensive redevelopment of edge and out of centre retail for a diverse mix of uses in accordance with LP Policy SD6 and SD7 to release the full potential of these sites for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport.
- 4.35 In promoting an effective use of land in meeting the need for homes and other uses for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land<sup>30</sup>, the Framework promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. It gives as an example using space and airspace above shops for housing<sup>31</sup>, and promotes support for using retail land for homes in areas of high housing demand provided this would not undermine key economic sectors or sites or the vitality and viability of town centres.<sup>32</sup>
- 4.36 As the Government has stated recently, optimising brownfield land for sustainable housing development to deliver economic growth is the most important context for consideration of local plan reviews as set out in recent ministerial statements, and reforms to national policy.
- 4.37 The CLPRPSD appears to have fundamentally missed the opportunity to respond to this policy direction, for accessible, brownfield supermarket sites available for development, and should be updated accordingly.

## Climate change

- 4.38 The Written Ministerial Statement made on 13 December 2023 in respect to the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards. It states the following.

*'The Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple,*

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<sup>28</sup> LP SD7(C6a)

<sup>29</sup> LP SD7(C6b)

<sup>30</sup> Framework paragraph 124

<sup>31</sup> Framework paragraph 125 c) and d)

<sup>32</sup> Framework paragraph 128 (a)



*local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.*

*Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale...*

*'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one.'*

- 4.39 The principles set out in this ministerial statement apply throughout the CLPRPSD at Chapter 8 and the policies within, and we do not support an approach which seeks to apply new standards beyond those set by this government.

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

- 4.40 CLPRPSD Policy IE4 (Affordable and Specialist Workspace) is new and would require all major schemes (including mixed use developments) providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the delivery of affordable workspace. It will also apply to sui generis uses of a similar nature or character.
- 4.41 We are concerned that an arbitrary requirement of 20% affordable workspace at 50% market rent is wholly unrealistic and that the target should be much less onerous. We understand that the average affordable workspace delivered on schemes in Camden is usually less than 10% of the uplift in floorspace and at 80% of the market rent. Imposing yet further stringent policy requirements will lead to further protracted planning negotiations and delay in delivery. The policy should be assessed on a site-by-site basis and factor in viability as well as other policy requirements.

**End**

**APPENDIX 1:**

**Correspondence with Camden Council Policy Team**

---

**From:** PlanningPolicy <PlanningPolicy@camden.gov.uk>  
**Sent:** 24 June 2025 13:13  
**To:** Lauren Cleall  
**Subject:** RE: Document request - BNPP Local Plan Review Viability Study - Regulation 19 Update  
**Attachments:** LB Camden LP Viability Testing - Appraisal Typology 16 £1,300 psf 13June25.pdf

Hi Lauren

Further to our previous emails please find attached the viability information requested.

Kind regards

Rebecca

Rebecca Burden  
Development Plans Manager

---

**From:** [REDACTED]  
**Sent:** 16 June 2025 11:50  
**To:** PlanningPolicy <PlanningPolicy@camden.gov.uk>  
**Subject:** RE: Document request - BNPP Local Plan Review Viability Study - Regulation 19 Update

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

Hi Rebecca

Just to clarify, we currently have the appraisal inputs and outputs from the BNPP modelling within their report / appendices. What we are missing is the appraisals themselves which translate the input to the output. We have tried to prepare our own appraisal using the BNPP inputs but unfortunately don't get to the same output as BNPP. In order to engage further on the local plan we therefore need to see the appraisals and have picked the most relevant one to us as per the email trail below.

We appreciate BNPP's modelling is typology based but it is still critical that we can properly understand it as the typologies clearly inform the policies.

In terms of our client, we are currently advising St George who have current development in the borough and may consider other sites in the future.

Let me know if there are any queries.

Kind regards,  
Lauren



Lauren Cleall



---

**From:** PlanningPolicy <[PlanningPolicy@camden.gov.uk](mailto:PlanningPolicy@camden.gov.uk)>

**Sent:** 13 June 2025 16:45

**To:** Lauren Cleall <[lauren.cleall@quod.com](mailto:lauren.cleall@quod.com)>

**Subject:** RE: Document request - BNPP Local Plan Review Viability Study - Regulation 19 Update

Hello

Thank you for your email. Apologies for the delay in getting back to you.

You should find the results of the modelling for the typology you are interested in on page 240 of Appendix 2 (baseline results) and Appendix 3 (with growth applied).

The modelling provided by BNP PRE has been designed to provide results across a wide variety of development typologies in different areas, against different benchmark land values and different residential sales values. It has not been designed to output full details of the modelling for any one tested scenario. Furthermore, it is unlikely that any one tested scenario will match closely to any individual scheme being proposed in Camden as the scheme is likely to have different characteristics in terms of the mix of uses proposed, the area of land involved, and/ or the specific value of existing uses on the site.

In the light of this, it would be helpful to know which scheme / site you are representing and how you envisage the detailed modelling for one tested scenario would be useful in informing your response to the Local Plan consultation?

Kind regards

Rebecca

Rebecca Burden  
Development Plans Manager

---

**From:** Lauren Cleall <[REDACTED]>

**Sent:** 11 June 2025 09:02

**To:** PlanningPolicy <[PlanningPolicy@camden.gov.uk](mailto:PlanningPolicy@camden.gov.uk)>

**Subject:** RE: Document request - BNPP Local Plan Review Viability Study - Regulation 19 Update

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

Hi Rebecca,

I hope you're well.

I'm just following up on the below and was wondering whether you would be able to share the pdf of the development appraisal for Typology 16, BLV 4, with all regulatory costs included and based on a £1,300/ft² value, which is referenced within the BNPP Local Plan Review viability study.

Many thanks,  
Lauren



Lauren Cleall



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**From:** Lauren Cleall

**Sent:** 06 June 2025 14:20

**To:** PlanningPolicy <[PlanningPolicy@camden.gov.uk](mailto:PlanningPolicy@camden.gov.uk)>

**Subject:** RE: Document request - BNPP Local Plan Review Viability Study - Regulation 19 Update

Hi Rebecca,

The actual development appraisals for the specific typologies don't seem to be attached in the appendices of the viability studies, just the results of them.

It is a copy of the specific development appraisal for Typology 16, BLV 4, with all regulatory costs included and based on a £1,300/ft<sup>2</sup> value which I am looking for.

Kind Regards,  
Lauren

---

**From:** PlanningPolicy <[PlanningPolicy@camden.gov.uk](mailto:PlanningPolicy@camden.gov.uk)>

**Sent:** 06 June 2025 11:46

**To:** Lauren Cleall [REDACTED]

**Subject:** RE: Document request - BNPP Local Plan Review Viability Study - Regulation 19 Update

Hello

Thank you for your email. Our updated viability study and appendices are all available on our website - [Evidence - Camden Council](#)

They can be found under the heading 'Camden Local Plan Proposed Submission Draft 2025'

Kind regards

Rebecca

Rebecca Burden  
Development Plans Manager



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**From:** Lauren Cleall [REDACTED]

**Sent:** 06 June 2025 10:18

**To:** PlanningPolicy <[PlanningPolicy@camden.gov.uk](mailto:PlanningPolicy@camden.gov.uk)>

**Subject:** Document request - BNPP Local Plan Review Viability Study - Regulation 19 Update

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

To whom it may concern,

I hope you're well. I am writing to request a copy of a supporting document for the Camden Local Plan Proposed Submission Draft, in particular regarding the BNPP Local Plan Viability Study – Regulation 19 Update.

I would be grateful if you could send a copy of the development appraisal for Typology 16, BLV 4, with all regulatory costs included and based on a £1,300/ft² value, from the BNPP Local Plan Viability Study - Regulation 19 update.

Thank you for your help, and please let me know if any further details are needed.

Kind Regards,

Lauren



Lauren Cleall



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## APPENDIX 2

### Allocation C7 - Morrisons supermarket

CLPRPSD Allocated Use: ~~Permanent self-contained homes, employment (offices and maker spaces), retail, food and drink, community and leisure use~~

Proposed Allocated Use: Housing (including housing proposed by H1, H4, H8, H9, H10); main town centre uses (as defined by Framework glossary<sup>33</sup>)

#### CLPRPSD Context:

~~The site is covered by the Council's adopted Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.~~

This site will make a significant contribution to the Council's housing supply, with the permitted schemes (2017/3847/P and 2022/3646/P) delivering 644 homes. ~~Should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including the on-site affordable housing) to be maintained or increased and the key benefits for the wider area to be delivered.~~ CLPRPSD Development must:

8. ~~remove~~ reduce existing car parking in line with this Plan's car-free approach

The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, ~~with 12m – 53m considered the potentially appropriate height range.~~ 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. The Council has granted planning permission for a development of up to 56m. ~~That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development.~~

#### CLPRPSD Other Considerations

~~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).~~

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<sup>33</sup> **Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).



## APPENDIX 3

### Allocation C8 - Former Morrisons petrol filling station

CLPRPSD Allocated Use: ~~Permanent self-contained homes; employment (offices), retail, food and drink~~

Proposed Allocated Use: Housing (including housing proposed by H1, H4, H8, H9, H10); main town centre uses (as defined by Framework glossary<sup>34</sup>)

### CLPRPSD Indicative Capacity

~~A contribution to delivery of housing off site will be expected, having regard to relevant Local Plan policies, including Policy H2. In the context of the development permitted, this contribution is encompassed in the housing-led development of the Morrisons supermarket site (Allocation C7).~~

### CLPRPSD Context

~~The site is covered by the Council's Camden Goods Yard Planning Framework Supplementary Planning Document (SPD). Regard should be had to the vision and objectives set out in the Framework when taking forward the development of this site.~~

~~If this site were to come forward for development on its own, a scheme including self-contained housing will be sought by the Council, where this is consistent with activating the southern frontage of Chalk Farm Road and is co-ordinated with proposals for 100 Chalk Farm Road. The residential capacity will be assessed at that stage.~~

### CLPRPSD Other Considerations

~~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).~~

---

<sup>34</sup> **Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

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

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

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

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

This form has two parts –

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

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

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

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

#### 1. Personal Details\*

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

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

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Neil
Last Name	<input type="text"/>	Wells
Job Title (where relevant)	<input type="text"/>	Associate Director
Organisation (where relevant)	St George West London Limited	Quod
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	London	<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: **St George West London Limited (“St George”)**

**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
Please refer to submitted Representations – “St George West London Limited; Camden Local Plan Regulation 19 Representations; Camden Goods Yard”	Please refer to submitted Representations – “St George West London Limited; Camden Local Plan Regulation 19 Representations; Camden Goods Yard”	Please refer to submitted Representations – “St George West London Limited; Camden Local Plan Regulation 19 Representations; Camden Goods Yard”

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

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

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

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

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

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

Please refer to submitted Representations – “St George West London Limited; Camden Local Plan Regulation 19 Representations; Camden Goods Yard”

(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 refer to submitted Representations – “St George West London Limited; Camden Local Plan Regulation 19 Representations; Camden Goods Yard”

(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 refer to submitted Representations – “St George West London Limited; Camden Local Plan Regulation 19 Representations; Camden Goods Yard”

**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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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:	27/06/2025
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# Notes to accompany the Representation Form

## 1. Introduction

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

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

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

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

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

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

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

## 3. Soundness

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

### • ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

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

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

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