

Date: Fri, 27 Jun 2025 15:46:00 +0000
From: carla de Petris
To: planningpolicy@camden.gov.uk
Subject: Gypsy and Traveller site

I am the leaseholder of [redacted]. At present I am abroad but want to join the protest against a Gypsy and Traveller Site planned in the area on Adelaide road at the end of Eton College Rd for all the good reasons expressed by NERA of which I am a member.

Regards

Mrs Carla De Petris

Date: Fri, 27 Jun 2025 16:46:55 +0100

From: Valerie Burton

To: [redacted]

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

OUTLINE OF OBJECTION/REPRESENTATION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

: At this current time with a proposal for retro-fitting the Etons as gated residential premises before the planning community, this plan has increased the perception of social threat in the area and can only spell out the creation of further social divisions.

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

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

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

Conclusion

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

Date: Fri, 27 Jun 2025 15:47:28 +0000
From: Jeremy Clyne
To: planningpolicy@camden.gov.uk
Subject: Site allocation C27 Proposed Gypsy and Traveller Site next to Constable House

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

Dear Sirs,

I am writing to object strongly to this proposal.

I have been a [redacted] and my first reaction on hearing of this proposal was that it was so absurd that it must be some kind of mistake.

The site is clearly unsuitable for the purpose proposed and I find it unbelievable that Camden Council should think it fit to allow the takeover of established housing amenity land, long enjoyed by estate residents and their children. To make it worse, from what I've been told, the residents of Constable House have not been consulted about this and have been treated with the utmost contempt.

The tenants will no doubt be strongly exercised about this. But I also wonder about residents who may also be leaseholders, and therefore have additional established legal rights as owners.

We are told that the Council could come up with only two potential sites in the whole of the borough, but no information that I am aware of has been made available as to why this site was thought acceptable and all the 50 or so others were deemed not to be.

I trust this site will be deleted from those being considered.

Jeremy Clyne

[redacted]
[redacted]

[redacted postcode]

Date: Fri, 27 Jun 2025 15:47:52 +0000
From: Michael Eberhardt
To: PlanningPolicy
Subject: Camden Resident objection to Holmes Road Recycling center proposal

I hope this message finds you well.

My wife and I wanted to contact you as [REDACTED]
[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,
Mike Eberhardt

Date: Fri, 27 Jun 2025 16:48:19 +0100

From: Andrew Nahum

To: [redacted]

Subject: Objection to proposed Travellers site by Constable House on Adelaide Road

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate page for each representation

Name or Organisation:

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

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

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

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

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

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="Not sound"/>
(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="Not justified"/>
(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="Not effective. Site too small,"/>
(4) Consistent with national policy	<input type="text" value="Environmentally destructive. No"/>

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

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

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

The green space by Constable House is a much appreciated small park and a valuable amenity for its residents. The proposed site impacts the many residents of Constable House very negatively. It also affects the many occupants of Bridge House opposite, all the dwellings on Eton College Road and the wider surrounding area. The sacrifice of an appreciated green space seems at odds with national ecological policy.

It adversely affects a huge number of people for a very small uplift in the amount of accommodation available for the traveller community.

As stated, the site is too small to make a significant difference to the council's targets.

(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 proposal for a site by Constable House on Adelaide Road needs to be removed from Draft Local Plan in H11, pages 294-5 on the Travellers Site in Adelaide Road needs to be removed from the Draft Local Plan submission.

(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	X
(b) when the Inspector's Report is published	X
(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:	Andrew Nahum (online submission)	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 15:49:03 +0000
From: Slaney Devlin
To: PlanningPolicy
Subject: Representation form for draft local plan

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.

Please find attached a completed representation form for the draft Local Plan.

Kind regards,

Slaney Devlin

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

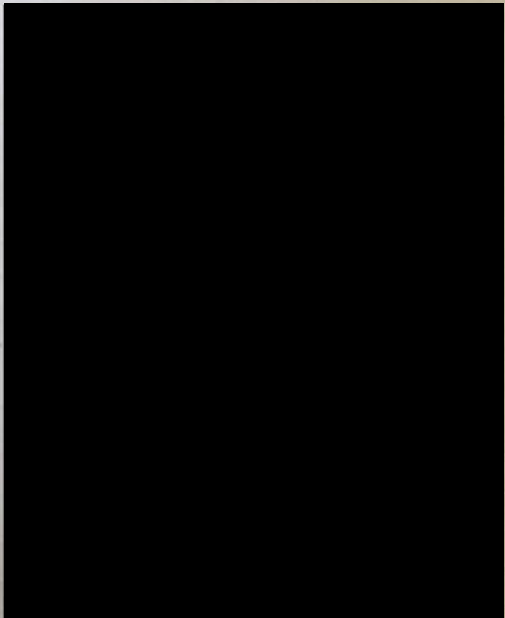
Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="MRS"/>	<input type="text"/>
First Name	<input type="text" value="SLANEY"/>	<input type="text"/>
Last Name	<input type="text" value="DEVLIN"/>	<input type="text"/>
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"/>	<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: *Slaney Devlin*

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

☒

(3) Complies with the Duty to co-operate

Yes

No

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

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

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

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

☒

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

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

(4) Consistent with national policy

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

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

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

As part of the Evidence Base, the plan relies on the Open space, Sports and Recreation Study, June 2014. This study is out of date, particularly in the Euston and Kings Cross areas that have seen so much change. Relying on other plans coming forward is not acceptable: the evidence base for this plan should be up-to-date.

I was at the examination of the existing Local Plan when the inspector questioned whether the 2014 study was ~~still relevant~~ comprehensive. I also remember questions about it being completed 2 years before examination. The study is now 11 years old and requires updating.

(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.

commission a new open spaces study.

(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:

It is important for the inspector to understand the level of change in our area and the importance open space has to our health and wellbeing.

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

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

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

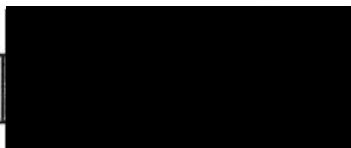
Privacy Notice

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

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

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

11. Signature:



Date:

27 June '25

Responder 636

Date: Fri, 27 Jun 2025 16:49:14 +0100

From: Charles Dekan

To: [redacted]

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

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

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

Good afternoon,

I am currently [redacted] and have been made aware of the draft plans to establish a Traveller Site on Adelaide Road.

As a local resident I am deeply sympathetic to the need to generate more space for people to live in the area. I am also aware of the prejudice to which the Traveller community are unfortunately often subject. I would therefore never want to object to a new Traveller site in the borough without due cause, and would always remain in favour of providing such sites in the borough as needed.

I have however been made aware of several possible issues with the current draft proposal. Most significant to me seems to be the impact that this site may have on Constable House, if residents there are to lose access to green space and play areas.

I have however not seen detailed plans for the proposal, and, indeed, am not sure if such plans are publicly available at this time. Given this, it is hard for me to determine what the impact of the site would be, and if my concerns are addressed.

I would therefore greatly appreciate if I could be provided with any further details of the proposal, and be included (as suitable) in any future communications and consultations on this issue.

Kind regards,
Charles Dekan

[redacted]
[redacted postcode]

Sent from my iPhone

Date: Fri, 27 Jun 2025 15:51:54 +0000
From: Andrea Williams
To: Olivia Marshall, PlanningPolicy
Subject: RE: London Property Alliance representations to the Camden Local Plan
Proposed Submission Draft

From: Olivia Marshall <[redacted email]>
Sent: 27 June 2025 16:48
To: [redacted email]
Cc: Andrea Williams <[redacted email]>
Subject: London Property Alliance representations to the Camden Local Plan Proposed Submission Draft

Good afternoon,
Please find attached the London Property Alliance's representations to the Camden Local Plan Proposed Submission Draft.
Thank you for the opportunity to comment on the draft Plan and do let me know if you have any questions relating to our response.

Best,
Liv

Olivia Marshall

If you do not wish to receive future communication from City & Westminster Property Associations, please let us know and we'll make sure you don't.

We will always ensure we protect your privacy, any personal information you may share with us and your rights as detailed in the Data Protection Act 2018.

We will never share your personal data without your consent. [Click here to read our data protection policy](#)

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

Page | 1

By email only: planningpolicy@camden.gov.uk

27 June 2025

Dear Sir / Madam,

London Property Alliance representation to the Camden Local Plan Proposed Submission Draft April 2025

I am writing on behalf of the London Property Alliance (“LPA”) to respond to the consultation on the proposed submission draft of the Camden Local Plan (the “draft Local Plan”).

The LPA is a not-for-profit membership body and advocacy group representing over 300 of the leading owners, investors, professional advisors and developers of real estate operating across central London, providing a unified voice for the built environment. The LPA includes a Camden Working Group of key landowners and developers in Camden and a Knowledge Quarter Liaison Group of those members most active in the area. The membership for both groups can be found in Appendix 2 and the full list of our members [here](#) and [here](#).

The LPA fully supports the London Borough of Camden’s vision to create a fairer, greener, healthier and more prosperous borough as set out in ‘We Make Camden’. However, the economically, environmentally and socially sustainable growth that underpins this vision cannot be achieved without a strong supply of office, work and laboratory space that can accommodate the next generation of talent, boost productivity, foster innovation and support the important growth industries that are located within Camden, particularly the ‘south Camden’ area that forms part of the Central Activities Zone (CAZ) and the Knowledge Quarter.

The planning system is a key enabler of growth and our research, *Good Growth in Central London*, revealed that a balanced approach to growth with flexible planning policy in Camden could unlock 45,100 jobs, 6,300 new homes and an additional 4.4m sq ft of office floorspace by 2045 – boosting the borough’s economy by £11.2bn (GVA) in addition to generating £268m in borough Community Infrastructure Levy (CIL) and Section 106 (s106) contributions.¹ This is on top of the £37.7bn (GVA) already generated by Camden’s service economy.²

However, Camden has seen a 51% fall in major office planning applications determined between 2013-2023.³ Whilst this is in part due to macro-economic conditions, the cumulative impact of the growing number

¹ [Good Growth in Central London](#), London Property Alliance/Arup, 2024.

² [Regional gross value added \(balanced\) by industry: local authorities by ITL1 region \(current prices, pounds millions\)](#), ONS, April 2025.

³ [Good Growth in Central London](#), London Property Alliance/Arup, 2024.

of planning policy requirements is increasingly making development unviable. This is out of step with the Government's growth agenda and the Mayor of London's ambitious London Growth Plan, both of which need central London's economic hubs to support the delivery of new jobs, homes and offices to drive Good Growth.

In addition to our concerns surrounding the cumulative impact of the policies contained within the draft Local Plan, some of which we do not support, it is important that the following are addressed:

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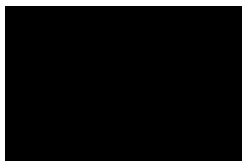
- Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) should not apply within the CAZ or the Knowledge Quarter, as it hampers development viability and does not reflect the unique nature and national economic importance of the Knowledge Quarter cluster.
- Policy CC2 (Prioritising the retention of existing buildings) is overly complex and fails to reflect the practicalities of delivering new development. It should be removed or substantially revised to align with strategic policy and government objectives.
- Whilst the amendments to Policy IE4 (Affordable and specialist workspace) following our earlier engagement are welcome, the targets contained within the draft Plan remain unrealistic, overly onerous and risk adding cost, delay and complexity to an already challenging planning process.

We also have concerns over the revised housing targets contained within the draft Local Plan, which are substantially lower than those set by the Government and Mayor. We would urge the Council to be more ambitious, reflecting the scale of the housing crisis.

We would like to thank the London Borough of Camden for its comprehensive engagement on the Plan throughout the drafting process, and value its ongoing commitment to working with the real estate industry to deliver sustainable development that will provide Camden with the homes, offices, retail and leisure amenities it needs.

We welcome the opportunity to comment on the draft Local Plan and look forward to continuing to engage with the Council as the Plan progresses. Our detailed representations can be found in Appendix 1.

Yours faithfully,



Charles Begley



The City Property Association (CPA) Company Reg 08256281 | VAT Reg 9056407032 and Westminster Property Association (WPA) Company Reg 08251671 | VAT Reg 888310790 are companies limited by guarantee in England

These representations have been prepared by Newmark on behalf of the London Property Alliance.

NEWMARK

Appendix 1 – LPA representations to the Camden Local Plan Proposed Submission Draft April 2025**Overarching points**

1. **Complexity and useability:** The Government has expressed a desire for a more streamlined and simplified planning environment, including more accessible local plans that can be better understood by local communities. This is something we fully support and believe that the current length of the Camden draft Local Plan of 580 pages makes this difficult to achieve. We recommend streamlining the local plan so it can be better understood and implemented by all.
2. **Cumulative impact on development viability:** In addition to the below comments on each of the proposed policies in isolation, there is overarching concern that, whilst individually well-intended, the impact of the layering of more policies and obligations contained within the draft Local Plan will be extremely detrimental to the viability of development going forward, stifling development and hamper the delivery of new homes, floor and laboratory space and community amenities.
3. The planning system is already under significant strain, with the delivery of new development increasingly challenged by the growing complexity of regulatory requirements including those relating to the Building Safety Act, Biodiversity Net Gain and Whole Life Carbon. The proposed additional requirements in the draft Plan create an additional burden, adding substantial time, resource and cost to the preparation of planning applications, which risks further discouraging investment.
4. **Flexibility:** As currently drafted, the Local Plan contains little scope for flexibility or ‘on balance’ judgements that might enable the council to respond to changing economic conditions over the plan period.
5. **Conformity with regional and national plans:** The GLA is aiming to adopt the new London Plan in 2027/28 and the Government is looking to introduce National Development Management Policies (NDMPs) later this year. Therefore, the draft Local Plan needs to provide greater flexibility to deal with emerging national and regional policy updates.

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Chapter 1: Introduction

1. **Overarching points:** The draft Local Plan seeks to deliver on Camden’s corporate ambitions as set out in ‘We Make Camden’ and provides strategic objectives and a vision for development in the borough, which we support.

Chapter 2: Development Strategy

1. **The role of the CAZ:** We agree that there should be strong support for delivering new development within the Central Activities Zone (CAZ), growth areas, town centres and other major development locations within Camden.
2. Given its central London location, the whole borough ought to be considered capable of delivering new development and this should be reflected in the draft Plan. We suggest that a further paragraph is added below Figure 3 – Key diagram to state: *“Whilst the key diagram identifies the areas of main*

focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan.”

3. **The role of the Knowledge Quarter:** As set out in the KQ2050 Strategy, the Knowledge Quarter has the potential to become the best place in Europe for collaboration, innovation and research, whilst fulfilling the social and economic potential for its residents. The critical role the Knowledge Quarter plays in delivering inclusive growth for the borough and London should therefore be emphasised in the draft Plan.
4. **Optimising land use:** We agree with the main principles of Policy DS1 which states that developments will be expected to optimise the use of land and make the best use of a site through mixed use development. However, mixed use development comprising residential and commercial floorspace is often not using land efficiently or making the best use of a site as it can lead to both uses being compromised, reducing the ability to optimise sites and deliver on local, regional and national objectives.
5. **Citizen Scientist contributions:** The draft Plan states that major applications will be required to contribute financially to the Council’s Citizen Scientist community research programme. There is a concern that additional financial contributions would place further burden on developments that are already struggling with viability. We would question whether this could reasonably meet the tests for s106 obligations as being necessary to mitigate the impact of development. We consider this unjustified and should be removed.

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Chapter 3: South Camden

1. **Consistency with the London Plan:** The Local Plan should be consistent with the London Plan (and the *Towards a new London Plan* document) where there is an emphasis on ensuring that CAZ is focused on economic development. As much of south Camden is located within the CAZ where the focus should be on growing and supporting the economic productivity of London, Policy S1 (Part A) should be reworded to say: *“The Council will ensure development in the south of the borough contributes to the area’s continued economic success...”* Moreover, employment and the economy should be ordered first and reference compliance with the London Plan.
2. **Housing:** Notwithstanding our comments on mixed use set out below, we support Policy S1 (Part G) where financial contributions towards housing could be used on Camden’s housing estates to enable the delivery of developments through the Council’s Community CIP Programme.
3. We support Policy S1 (Part J) which acknowledges that the CAZ and Knowledge Quarter will continue to be the main focus of employment development in Camden. We also support Part K, which seeks to support the Knowledge Quarter to thrive as a hub of innovation and knowledge-intensive industries in line with the KQ2050 Strategy. However, requiring housing on site in these locations is challenging both in terms of viability and the potential conflict between land uses and may prejudice the area’s economic productivity and future growth, contrary to London Plan objectives and the KQ2050 Strategy.

Chapter 7: Meeting Housing Needs

1. **Maximising housing supply:** There is a national mandate to deliver more homes, yet the draft Local Plan sets a target of 770 additional homes per year, which is significantly lower than the current local, regional and national housing targets for the borough.
2. The new London Plan is likely to set an updated target for the council. Whilst this is expected to be lower than the Government target of 3,137 additional homes per year, if the new target is in excess of the 770 proposed by the draft Local Plan, it will be inconsistent with both regional and national policy and should be amended to address this.
3. Policy H1 now supports other forms of permanent housing to meet more specific needs such as purpose-built student accommodation (PBSA) and housing for people with care or support requirements. This addition is welcomed and supported.
4. **Maximising the supply of self-contained housing from mixed use schemes:** Camden is the only London borough which still has a mixed use policy. It is in direct conflict with the London Plan and threatens to undermine the deliverability of commercial development in the borough. This impacts the commercial attractiveness of the area, particularly in contrast to other London boroughs who do not have this policy in place. Requiring housing from commercial-led schemes undermines other policy objectives in the Plan and the London Plan, particularly those promoting economic development within the borough, Central Activities Zone and Knowledge Quarter.
5. Whilst it is acknowledged that Camden is falling short of its annual housing targets and the delivery of self-contained housing is therefore a priority for the Council, we do not consider it appropriate or justified to require housing to be delivered alongside and to the detriment of commercial development in central London as an appropriate or justified strategy for addressing this issue. We therefore do not support Policy H2.
6. The mixed use policy is also inconsistent with national policy as set out in the National Planning Policy Framework (NPPF) which states that significant weight should be placed on the need to support economic growth and productivity. Given the importance of the CAZ and Knowledge Quarter to the national economy, we do not consider that any mixed use policy should apply in these areas and therefore question the extension of the application of Policy H2 to the new 'south Camden' area. The Plan should recognise the specialist nature of the Knowledge Quarter developments including science and technology, the strategic objectives for this sector and the challenges that it has in delivering housing.
7. If a mixed use policy is to remain, it should focus on a financial contribution to be used on other council-owned housing developments in the borough rather than requiring housing to be provided on site or off site. This approach would allow for the delivery of employment space where it is most needed whilst still enabling the CAZ and Knowledge Quarter to support the delivery of new homes, in line with Policy DS1.
8. Alternatively, the policy could seek a financial contribution on small to medium-sized schemes proposing increases in floorspace of up to 2,000 sqm, below which it is most challenging to provide

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the housing as part of a commercial scheme (and for which, under current policy, on site affordable housing is not required). In order to prioritise the delivery of affordable homes, we would also suggest that the policy is clear that where housing is required under any form of mixed use policy, the council will prioritise the delivery of affordable housing.

9. Consideration should also be given to a housing/affordable housing credit system to take account of situations where new housing/affordable housing is delivered by a developer early, or through a portfolio approach to development, and which can then be used to offset any planning requirement generated by a future scheme. This approach can deliver better outcomes in terms of early delivery of affordable housing in a more appropriate location. Page | 6
10. It is stated that off-site housing should be “as close as possible to the application site.” However, the opportunity to find an off-site location – particularly in the south of the borough – is rare and, if one is found, the cost of acquiring the site can render many schemes unviable. This is not acknowledged in Paragraph 7.60. Where an off-site solution is proposed, the site selection should be based on whether the site is appropriate to maximise the planning benefits of both the application and donor sites, in the context of the Local Plan.
11. **Maximising the supply of affordable housing:** Policy H4 (Part D) seeks to apply the affordable housing provisions of the London Plan for build-to-rent (BTR) housing, PBSA and large-scale purpose-built shared living, but as an alternative will strongly encourage contributions of on-site affordable housing. The recognition of London Plan policy requirements around these tenures and the flexibility introduced in this policy are welcomed.
12. As with the current Plan, there is support for innovative intermediate housing products that can be made affordable to a wider range of groups in Camden and the introduction of policy support for large-scale purpose-built shared living in line with the London Plan is welcomed and supported.
13. The draft Plan includes a new section on BTR and states that the council will be flexible in the application of affordable housing and dwelling size policies to the development of BTR housing where it considers such housing will help to create mixed, inclusive and sustainable communities. We support this flexibility.
14. The draft Plan acknowledges that additional student accommodation contributes not only to the student housing target but also to the overall housing target, addresses a permanent housing need and can reduce the pressure for students to share existing large homes. This introduction is supported and welcomed.

Chapter 8: Responding to the Climate Emergency

1. **Overarching points:** Whilst we fully recognise the climate emergency and support the council’s overarching aspirations relating to climate change, we consider that the policies contained within the draft Plan are too detailed and already covered at the national level in the latest Building Regulations and potentially through the emerging National Development Management Policies. This would accord with the Government’s intention to make local plans shorter and more concise.

2. **Energy Use Intensity:** Furthermore, the Energy Use Intensity (EUI) policy is inconsistent with the London Plan and therefore premature in advance of the London Plan Review. The Written Ministerial Statement made on 13 December 2023 states that the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards.

It states that:

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“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, 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...”

It goes on to state that:

“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.”

3. The current approach adopted in the draft Local Plan does not include “well-reasoned and robustly costed rationale” and is therefore inconsistent with national and regional policy and may therefore be considered unsound.
4. **Prioritising the retention of existing buildings:** Policy CC2 is more onerous than existing requirements. The new policy requires applicants to undertake a condition and feasibility assessment to understand the re-use potential of the existing buildings and explore the best use of the site, which includes a requirement for the applicant to explore a range of alternative uses.
5. Policy CC2 (Part C1) acknowledges that there may be significant structural issues with an existing building that would prevent it from being retained. The policy should make clear that, in these circumstances, proposals for substantial demolition would be acceptable without needing to carry out the development options appraisal.
6. Policy CC2 (Part C2), which relates to the selection of the development options, should only apply where the condition and feasibility assessments conclude that there are no significant structural issues present. The policy also does not recognise that, in some instances, one or more of the development options (retention and retrofit; substantial refurbishment and extension; reclaim and recycle) may not be practically deliverable for a variety of reasons, including financial viability.
7. **Financial viability:** Financial viability should be specifically referenced within the wording of the policy and supporting text. Delivering the development is reliant, primarily, on

investment from the private sector. In some instances, the commercial return associated with some of the options, particularly retrofit and substantial refurbishment, may be too low to enable developers to finance and pursue these approaches. Some interventions can involve complex and extensive physical works which are not only costly but may result in the provision of lower-value space, attracting lower rents due to compromises made in the design process.

8. Reviewing and testing all alternative options and permutations is likely to be prohibitively complex and expensive. The design work required would be very extensive and the time, costs and complexity of this may prevent some proposals from being considered and discourage potential investment, contrary to strategic objectives.
9. Overall, Policy CC2 as currently drafted is not positively prepared. It is overly complex and will produce uncertain development management outcomes. It is not likely to prove effective, in the context of plan-making for a location where growth is strongly supported, nor is it in general conformity with strategic policy. The policy needs to be reworded to address the concerns raised above or removed in its entirety for the reasons set out above.
10. **Minimising Carbon Emissions:** Policy CC4 states that developments should aim for the GLA aspirational benchmarks and, as a minimum, meet the GLA Whole-Life-Cycle Carbon standard benchmarks. We support the principle of setting evidence-based targets for developers and welcome the recognition in, Paragraphs 8.51 and 8.52 that these benchmarks set a range, however it should be noted that these targets may not always be achievable depending on the typology of the development and should therefore be applied flexibly, with supporting evidence where benchmarks cannot be met.
11. **Sustainability improvements to existing buildings:** The requirements in Policy CC5 are too prescriptive and, whilst it is recognised that these should be “appropriate to the scale or nature of the proposal,” further guidance on this should be provided to ensure the policy is sound.
12. **Energy use and the generation of renewable energy:** Draft Policy CC6 requires renewable energy generation on site to match, or be in excess of, the predicted annual EUI. Where a development is unable to achieve the quantity of renewable energy generation on site, the council will expect an offset payment which should be related to the scale of the shortfall, subject to viability.
13. This offset payment is currently inconsistent with the London Plan. There is no guidance on how this offset payment would apply to referable applications where the GLA adopts a Part L model. The supporting text states that the offset payment is based on the cost of providing that capacity if the space had been available. The rate is based on the cost of deploying a certain type of renewable energy system, rather than the cost of offsetting carbon emissions, which is the ostensible purpose for which the s106 funding is being collected.

14. The study underpinning this fee in draft supporting Paragraph 8.87 presupposes extensive use of photovoltaics (PVs) and is based on off-site carbon savings being achieved solely by PVs. This is clearly impossible in a dense and historic urban environment such as Camden and is both unreasonable and considered unsound. There does not appear to be any viability evidence to support the offset calculation. There is also an absence of any viability evidence to demonstrate the impact on individual developments. It is considered that the carbon charge as proposed is unjustified, would not comply with CIL Regulation 122 nor relevant London Plan policy, and would have a material, adverse effect on development viability in Camden.
15. **Overheating and cooling:** Policy CC8 (Part 4) states that, where the need for active cooling is demonstrated to the council's satisfaction, the council will also require the carbon used to operate the system to be offset through the installation of solar PVs. The office market, and not just specialist commercial uses, is likely to still require active cooling. Passive cooling measures often add cost and disrupt the environmental controls on floor, as well as creating operational/management issues. An acknowledgement of market demands and applying policy flexibly is important in encouraging commercial development.
16. Draft supporting Paragraph 8.77 should be reworded to read: *"Active cooling (air conditioning) and excessive mechanical plant may be acceptable where it is demonstrated to the Council's satisfaction there is a clear need for it (i.e. sterile internal air, for some non-residential uses) and all other passive measures have been integrated, where feasible."*
17. **Sustainable drainage:** Policy CC11 (Part A) is too prescriptive and should be about referencing SUDs principles rather than requiring specific measures. It should also only apply to major developments.

Chapter 9: Delivering an Inclusive Economy

1. **Overarching points:** We strongly support the principle of growing a strong, diverse and inclusive economy and enabling residents, businesses and the voluntary sector to share in the borough's economic growth. We welcome the Plan's support to ensure a continuing supply of employment development to deliver growth and innovation.
2. However, whilst it is appropriate for the majority of the criteria in draft Policy IE1 to be set out in the Local Plan, we consider that a number of the criteria go beyond what is appropriate for planning policy to control:
 - a. The planning system is not the appropriate vehicle to address the provision of childcare facilities to support working families. Policy IE1 (Part 11, we therefore question its inclusion.

- b. The market should dictate the need to provide digital connectivity to support occupiers. This is not a planning requirement and Policy IE1 (Part 12, we therefore question its inclusion.
3. **Offices:** We support the overarching aims of Policy IE2 to manage and protect Camden's office stock to ensure that suitable and viable accommodation is retained, and welcome the specific support for ensuring a sufficient supply of space for research and development. This is fundamental to the success of the Knowledge Quarter and the aspirations of the council in KQ2050.
4. Protecting space which is suitable and viable is key, particularly given the sectoral shift that has occurred in the office market post-Covid, where demand for Grade A space in the most accessible locations is high, but that demand is limited for secondary offices which are not well located and/or fail to meet modern occupier requirements for quality, flexibility and sustainability.
5. The reduction in the length of the marketing period required (from 24 to 12 months) to justify a loss of office space in Policy IE2 (Part C) is therefore welcomed. Reference to premises which cannot lawfully be leased due to their energy efficiency performance requirements is also welcomed.
6. Discounted rent and incentives are not a planning matter and are therefore unjustified and should be removed from Policy IE2 (Part C2).
7. Whilst it may be feasible to reconfigure office space, if there is a lack of demand for the space, it is not reasonable for landowners to invest in reconfiguring a building which is not fit for purpose. In any event, in most cases, internal alterations do not require planning permission and reference to this in Policy IE2 (Part C3) should be deleted.
8. Notwithstanding the floor area, if it can be successfully demonstrated that there is no demand for office accommodation, then there is likely to be no requirement to provide affordable workspace. Reference to the provision of affordable workspace should therefore be deleted from Policy IE2 (Part D). If it is to remain, there should be clarity on the quantum of affordable workspace required.
9. Where office buildings become redundant, the council's preferred alternative use is housing. This reference should be deleted as, in many cases, housing in the CAZ may not be the best use of land.
10. **Industry:** As currently worded, Policy IE3 is inconsistent with the strategic objectives of the draft Plan and national policy in terms of promoting growth and maximising benefits through a mix of uses. The policy should be more positive and refer to the need to balance the prioritisation of industrial/warehousing retention (Policy IE3 (Part B)) with other land use priorities, in particular residential as "the priority land use in the Plan" (Policy DS1 (Part A)) and also with land use provisions in site allocation policies. As drafted all these

policies appear to compete without much clarity on how the planning authority will apply the planning balance.

11. The policy should emphasise the need to promote the creation of jobs across a range of flexible E/B use classes rather than focusing on the re-provision of industrial uses, particularly when a number of the existing industrial units and warehouses are vacant. Where industrial sites are within the Knowledge Quarter, flexible E/B use classes have the potential to deliver greater social value/inclusive economic benefits.
12. **Affordable and specialist workspace:** It is welcome that, following our previous representations, Policy IE4 has been updated to clarify that the affordable workspace provision would be based on net additional floorspace, not gross. As is the cascade approach to this policy, which seeks on site provision first, then off-site and then a payment in lieu.
13. However, it is considered that 20% affordable workspace at 50% market rent is wholly unrealistic and this target should be much less onerous. The average affordable workspace delivered on schemes in Camden is usually less than 10% of the uplift in floorspace and at 80% of the market rent. Imposing yet further stringent policy requirements will lead to further protracted planning negotiations and delays in delivery.
14. Instead, the policy should be assessed on a site-by-site basis and factor in viability as well as other policy requirements. Developers often find themselves providing affordable workspace that they cannot let and then having to renegotiate the legal agreement leading to delays and costs. Imposing more stringent policy requirements will only exacerbate this further.
15. It is generally supported that the council will consider a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. However, any provision must be consistent with the definition of affordable workspace set out in the London Plan.
16. The council will also seek payment in lieu of provision where the affordable workspace provided would be less than 300 sqm (except in Hatton Garden), as it can be difficult to find occupiers for very small spaces. Occasionally, a blend of direct provision and payment in lieu may present the most suitable approach. This flexibility is supported.
17. More specific regard should be given to the requirements of the Knowledge Quarter within Camden and the acute shortage of start-up and grow-on space for life sciences, which has been widely reported. A more flexible approach should be taken to laboratory development which acknowledges the cost and specification required to set up affordable laboratory space, and that the skills required to run such spaces are significantly greater than standard affordable office space.
18. **Hotels and visitor accommodation:** Policy IE5 now limits large hotels (over 2,500 sqm GIA) to the CAZ, with smaller and medium-sized hotels allowed in town centres and mixed-

use areas within the CAZ. However, 'small' and 'medium' are not clearly defined. Most modern hotels need at least 80–90 rooms to be financially viable, which usually means they exceed 2,500 sqm. Hotels support local jobs and spending, and should be encouraged, particularly if redundant buildings are being re-used.

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

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20. **Supporting designated centres and essential services:** Draft Policy IE6 includes a new requirement for major developments providing 2,500 sqm or more of retail floorspace to include a proportion of smaller units, including floorspace available at a discount to market rents. There is no justifiable evidence base or viability analysis to support this requirement and a lack of any detailed guidance and therefore it should be removed.

Chapter 10: Supporting Camden's communities

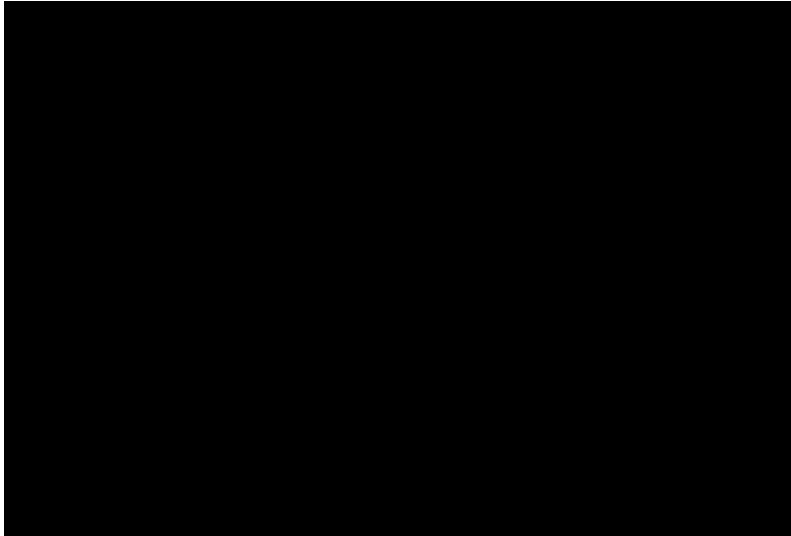
1. Policy SC5 (Part 2) seeks to secure the provision of suitable space for on site food growing. Whilst the principle of this is supported, it is not a planning requirement and therefore should be removed. If it is to remain, it should form a part of the open space requirement of Policy SC3.

Chapter 12: Design and Heritage

1. **Overarching points:** Camden's unique character and identity is what makes it the place it is today – an attractive place to live, work and visit. We strongly support the council's aspiration for good design which supports this character.
2. **Achieving design excellence:** We support Policy D1 (Part A)'s objective of achieving excellence in architecture, responding to climate change, improving the health and wellbeing of Camden's communities and celebrating the diversity of Camden's people and place.
3. Policy D1 (Part C2) states that, where public spaces are provided as part of developments, the Council will require that these spaces celebrate and reflect the diversity of the communities they are within through high-quality interpretation, events, public art and decorative features codesigned with local people. Whilst there may be instances where co-design is appropriate, we are concerned with this being a requirement of policy and this reference should be removed.
4. Draft supporting Paragraph 12.12 refers to the use of architect retention clauses in legal agreements where appropriate. The retention of the architect by a developer post-planning is driven by a number of factors. It should not be a decision for the local planning authority. The purpose is to ensure design quality, which is controlled through the use of detailed design-related conditions. This bullet point should therefore be removed.
5. **Tall buildings:** In line with the London Plan requirements, the draft Plan defines tall buildings and indicates where tall buildings are appropriate across the borough. The introduction of a new 'south Camden' area effectively seeks to extend the CAZ and the policies applicable to developments in the CAZ further north. It therefore seems reasonable for the 40m height threshold to be defined by the

south Camden boundary rather than the CAZ boundary. Given the borough’s central London location and appropriateness for development across the borough which can deliver much-needed economic development and homes, we consider that there should be more reference to, and support for, high-density development across the whole of the borough.

Appendix 2 – Members of the LPA Knowledge Quarter Liaison Group and Camden Working Group



Date: Fri, 27 Jun 2025 15:52:31 +0000

From: Daniel Olive

To: PlanningPolicy

Subject: Local Plan

I understand that it is proposed that the local plan will allow for or encourage the movement of the recycling site at Regis Road to the police station site, right next to a school and residential uses, away from the current site. The current site is wedged in with other nuisance uses such as the railways. Moving it towards all sorts of sensitive neighbours is contrary to most principles of land use planning, and should not be done. It belongs at the furthest point from sensitive receptors, on land already rendered unsuitable for sensitive uses such as housing. That would likely be near the current site, which is already unsuitable for housing due to the railway.

I note that the plan only calls for the "main" entrance to the police station site to be from Regis Road, allowing for the addition of further traffic to the road which has had highly restrictive and frankly draconian controls imposed. The same is true of the wider area, which also has many highly restrictive controls on vehicles. To allow any further increase must mean that either planning policy or traffic policy is irrational.

I would note that the current traffic on Holmes Road from the site, in as far as it exists, is mainly or entirely police traffic. The standard of police driving is much higher than the average driver - to add further traffic that is not to that standard is absurd.

Principle 16 of allocation C2 should be amended to reflect that these council functions are for councils to provide, and that there is no reason to tie those functions to that site. Given Camden LBC's approach to the provisions of these amenities, they should not be unduly privileged over other considerations. If Camden LBC thinks very little provision is needed for public toilets in Camden Town, why on earth would they be important here?

Provision 30 (prejudice servicing access for pedestrian access) is incompatible with the suggestion that Holmes Road will not be used to service the police station site. Provision 30 should be deleted or heavily altered. Again, Holmes Road is subject to very severe traffic restrictions, and any possibility of shifting servicing to that road must mean that one or both of planning and traffic policy is irrational.

Provision 32 - There is no connection between this site and the current state of public transport provision. The lack of step-free access in particular is an existing deficit, to be remedied by the operator to come into line with existing requirements. In no way is any sort of cash grab (one might say "shake down" or "extortion") to fund it relevant to the use of this site.

This is my provisional response, but I will be providing a fuller response to the extended timetable agreed with IARA and provided to IARA members (including myself) in your letter to IARA. As this consultation was very poorly advertised, I only found out about this a few days ago. I have had to omit numerous issues, and arguments and points, which I will provide to the extended timeframe agreed by Camden LBC.

Daniel Olive

[redacted address]

Date: Fri, 27 Jun 2025 15:56:06 +0000
From: Thomas Roe KC
To: PlanningPolicy
Subject: Local Plan consultation response



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Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate page for each representation

Name or Organisation:

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

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

*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" value="x"/> |
| (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities) | <input type="text"/> |
| (4) Consistent with national policy | <input type="text" value="x"/> |

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

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

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

This comment relates to Part C(2) of Policy H11 – Accommodation for Travellers: ‘the following sites have been allocated ... C27- Land adjacent to Constable House, Adelaide Road.’

I write as a local resident. The allocation of that site is not in my view the most appropriate strategy and it is not consistent with national policy, namely Part 3, Policy B, para 10(e) which requires local authorities, in producing their Local Plan, to ‘protect local amenity and the environment.’

Placing a traveller site in this densely populated site will not protect local amenity and the environment. It will tend to degrade local amenity and the quality of the environment in terms of noise, litter, and antisocial behaviour.

(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 relevant paragraph should be deleted from the Local Plan

(Continue on a separate sheet if necessary)

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

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

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

x

No

Yes

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

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

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

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

Privacy Notice

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

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11. Signature:	THOMAS ROE	Date:	27.6.25
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

Date: Fri, 27 Jun 2025 15:58:06 +0000

From: Alice Gibb

To: PlanningPolicy

Subject: Representation form - Site Allocation C27

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

This form has two parts –

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

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

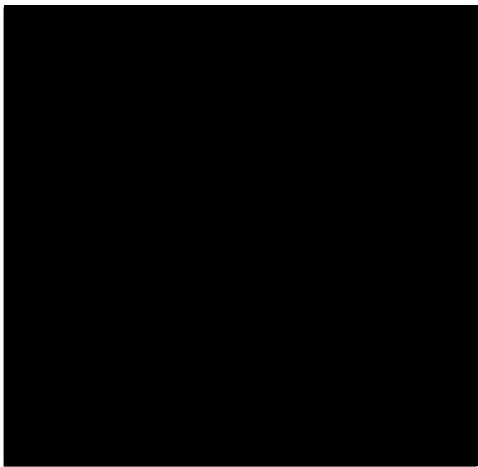
Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Alice"/>	<input type="text"/>
Last Name	<input type="text" value="Gibb"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*		<input type="text"/>
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

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

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

(3) Complies with the Duty to co-operate

Yes

No

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

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

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

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

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

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

(4) Consistent with national policy

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

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

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

Unsuitable:

- will be impacted by H2
- is a built up area
- will be very visible in a highly built up area
- next to a main road a railway and on an ambulance run
- loss of green space and play area.

(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.

Impractical; not properly consulted

(Continue on a separate sheet if necessary)

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

☒

No

☐

Yes

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

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

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

Privacy Notice

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

11. Signature:	<div></div>	Date:	27/6/25
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Date: Fri, 27 Jun 2025 16:58:03 +0100
From: Andy Bull
To: [redacted]
Subject: Planning response attached

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

Part B – Please use a separate page for each representation

Name or Organisation:

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

Documents can be found at the following links:

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

Paragraph

Policy

C27

Policies Map

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

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

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

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

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

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

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

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

The proposed allocation is unsound and should be removed on the basis of:
1) Loss of valued green space 2) Complete lack of consultation, explanation, discussion with surrounding community 3) Overlooking and privacy conflicts 4) Space is completely inadequate for the community would be meant to serve, too small, too congested, too vulnerable to flooding, and suffers from nearby HS2 building works

(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.

An alternative site should be found

(Continue on a separate sheet if necessary)

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☒

No

☐

Yes

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11. Signature:	Andrew Bull	Date:	27/6/82
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Notes to accompany the Representation Form

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3. Soundness

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• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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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.

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Date: Fri, 27 Jun 2025 15:58:34 +0000
 From: Tony Edwards
 To: PlanningPolicy
 Subject: COMMENT ON DRAFT CAMDEN LOCAL PLAN

Camden Local Plan - Proposed Submission Draft 2025 - Representation Form

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

D5 and
Conservation
Areas

Policies Map

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

- | | | | | |
|--|-----|----------------------|----|---------------------------------|
| (1) Legally compliant | Yes | <input type="text"/> | No | <input type="text" value="NO"/> |
| (2) Sound | Yes | <input type="text"/> | No | <input type="text" value="NO"/> |
| (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)
- (2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)
- (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)
- (4) Consistent with national policy

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

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

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

The Historic Environment policy, as enforced by Town Planning Dept, does NOT comply with the Climate Change act 2008, which it is required to do, including with all buildings in Conservation Areas.

Roughly half homes in Camden, are in Conservation Areas.

I am an architect retired, with a diploma in Historic Building, so I understand heritage issues, along with climate priority.

In 2012, the Conservation Officer Joanna Eccleston, and Sustainability Officer Harold Garner, examined a pilot CA study: Dartmouth Park CA, and were told to agree what EWI (External Wall Insulation), they agreed shall be permitted for all homes in CA.

This was fully reported in document "ENERGY EFFICIENCY IN DARTMOUTH PARK CONSERVATION AREA", with a table of all homes, with what was permitted. (eg in Lissenden Estate, EWI can be installed on flank and rear walls, but not on front decorated red bricks.)

Since then, the Town Planning Dept have successfully prevented EWI in nearly all homes, about 3,500. Except in a councillor's home in Spencer rise, and possibly a tiny number of other homes. This is contrary to the law.

It is clear Town Planning want to prevent changes such as EWI in CA's.

At a recent meeting about retrofit in CA's, in library, Bethany Cullen senior Conservation Officer said Conservation was constrained by Conservation legislation.

She did not mention equal constrain by Climate Change Act, which requires wall insulation which contributes 35% of heat loss from homes (glazing only contributes 10%. See Energy Saving Trust advice)

With a very substantial proportion of homes being solid walls, the required insulation can only go on outside.

This is because IWI (Internal Wall Insulation) is very risky (much more risky than External Wall Insulation) for causing dampness, mould, and diseases like asthma.

Town Planning Dept also prevent EWI from being installed by making conditions that are so expensive that no-one has done it,

(Including councillor in Spencer Rise above)#

Camden acknowledges that there is a Climate Emergency. This is now so extremely urgent, that it is too late to do the Paris Agreement of 2015 to keep Carbon dioxide emissions below 1.5 degrees. This is now seriously dangerous for our children's climate and survival and should be given much higher priority, than Camden's Town planning dept do.

There is a greater priority for survival of humans, over conserving historic buildings, and Camden should prioritise retro-fitting insulation, and other energy measures, above historic Conservation.

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

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

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

☐ no

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:

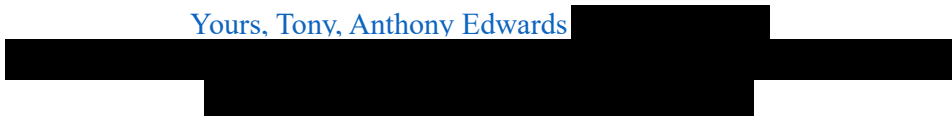
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. 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	Y
(b) when the Inspector's Report is published	Y
(c) when the Camden Local Plan is adopted	Y

11. Signature:	A E Edwards	Date:	27/6/25
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Yours, Tony, Anthony Edwards



Date: Fri, 27 Jun 2025 16:58:43 +0100

From: Denise Neves

To: [redacted]

Subject: Proposal to Gypsy and Traveller accommodation in the Camden Local Plan

I am writing to object to the Gypsy and Traveller accommodation proposal in Chalk Farm. Here are my reasons.

1. The site is too small and the travellers will end up all around the area. It doesn't look safe or adequate. And the flats in that area have very limited green spaces.
2. There are lots of new flats under construction in the area and next door, which means the area will already be busier. For those who don't feel comfortable using Camden Town station due to the large amount of tourists and local crowd, Chalk Farm station is an alternative. This proposal may disturb the safer feeling we all have using Chalk Farm station.
3. The travellers site will disturb a residential area, and make the heavy traffic in Adelaide Road even worse.

Please find an alternative site for travellers accommodation that is more suitable and will not bring trouble to local residents.

Kind regards,

Denise Neves

Date: Fri, 27 Jun 2025 15:58:44 +0000
From: Elizabeth Woodall
To: PlanningPolicy
Subject: Submission of Representations on the Camden Local Plan Proposed
Submission Draft by Joseph Homes

Associate Director

[REDACTED]

[REDACTED]

[REDACTED]

This message is intended for the addressee only and may contain private and confidential information or material which may be privileged. If this message has come to you in error you must delete it immediately and should not copy it or show it to any other person. HGH Consulting is a trading style of Hephher Grincell Limited. Registered in England & Wales: 9340687. Registered address: [redacted address], London, [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

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)		
Organisation (where relevant)		
Address Line 1*		
Address Line 2		
Post Town*		
Post Code*		
Telephone Number		
E-mail Address		

Part B – Please use a separate page for each representation

Name or Organisation: Joseph Homes

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

C1, C2, H1,
H9, H10,
SC4

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 checked="" type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="checkbox"/>
(4) Consistent with national policy	<input 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 representation letter.

(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 representation letter which includes proposed modified wording for the policies referred to above.

(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:

Due to the size and strategic importance of the site in question.

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:	Elizabeth Woodall	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.



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

27 June 2025

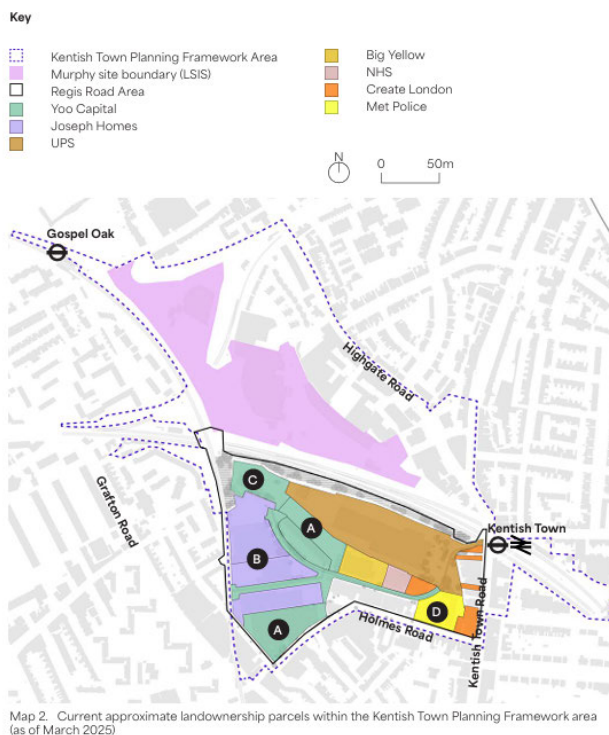
Dear Sir/Madam,

Draft New Camden Local Plan Regulation 19 - Submission of Further Representations on behalf of Joseph Homes

On behalf of Joseph Homes, we write to make 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, appended to this letter.

As noted within the previous representations, Joseph Homes own a large portion of land within the Regis Road Growth Area (RRGA) in Kentish Town. Since the Regulation 18 consultation in early 2024, there have been some significant changes to the local and planning policy context affecting the area, namely:

- Joseph Homes have acquired more of the land. Together with Yoo Capital, they are now the predominant landowners of the Western Parcel, as represented on the diagram below extracted from the Regis Road Area Guidance SPD.



- In December 2024, the Government made 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.
- LB Camden has adopted the Regis Road Area Guidance SPD as an addendum to the Kentish Town Planning Framework. This is a significant step forward in realising Camden's long-standing ambitions for large-scale regeneration of the Regis Road Growth Area.

The Proposed Submission Draft Local Plan contains a number of important policies relevant to the future development of the Regis Road area, which we comment on below.

Site Specific Policies - Draft Policies C1 'Central Camden' and C2 'Regis Road and Holmes Road Depot'

Joseph Homes are supportive of the general aims of draft policies C1 and C2. However, it is important that the policies are flexibly worded to allow a viable development to come forward and ultimately be delivered within the plan period. The following additions/modifications to the policy wording (in red) are therefore sought for soundness:

- Policy C1, Part D: *"These employment sites will be intensified to deliver a new neighbourhood that provides a mix of uses, including employment uses; significant provision of permanent self-contained homes and other forms of permanent housing where there is a demonstrable need; community facilities..."*

Reason: As presently worded, the policy precludes any housing which is not "self-contained homes", including specialist forms of permanent housing such as Purpose-Built Student Accommodation (PBSA) and Large-Scale Purpose-Built Shared Living (LSPBSL) (also commonly referred to as "Co-living"), for which there is an identified need both locally and strategically, and could, therefore, have unintended consequences.

Camden hosts some of the world's leading higher education institutions, many of which are clustered in the Knowledge Quarter around King's Cross and Bloomsbury. With nearly 100,000 students and researchers based in this innovation hub, demand for PBSA in Camden is high and growing, further intensified by limited supply in the private rental sector.

Research by CBRE and QX Global¹ has found a major accommodation shortage for students in London. Approximately 25,000 students currently reside in LB Camden, but there are only 13,000 PBSA beds available. In other words, there is a c.50% shortfall in PBSA within LB Camden. As a result, c.12,000 students are currently living in other forms of rental accommodation. Furthermore, there has been a 23% reduction in HMOs across London since 2021 putting pressure on already rising rents and leading to a lack of affordable options for students.

¹ https://www.cbre.co.uk/press-releases/london-plan-policy-fails-to-deliver-affordable-student-accommodation?utm_

Although regarded as a form of non-self-contained accommodation in the planning system, the London Plan (para 4.15.1) sets out that the housing need of students in London, whether in PBSA or shared conventional housing, is an element of the overall housing need for London, and that new PBSA contributes to meeting London's housing need. Specifically, paragraph 4.1.9 says that *“net 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”*. In recognition of the housing need met by student accommodation, its development contributes towards the Borough's Housing Delivery Test (HDT). LB Camden is meeting just 53% of its overall housing need, according to the 2023 HDT results.

Similarly, LSPBSL counts towards meeting housing targets on the basis of a 1:8:1 ratio, with 1.8 bedrooms/units being counted as a single home (London Plan para 4.1.9).

The Camden Local Housing Needs Assessment (May 2025) acknowledges for the first time Co-Living as a viable housing product. It recognises that potential demand for Co-living schemes in Camden is still uncertain due to only two small schemes having been completed, but the evidence from elsewhere is that the market could absorb at least 500 beds in Camden and this would help to expand the dwelling delivery in Camden. The report also highlights the potential overlap with student accommodation, with Co-living schemes having the potential to be re-purposed in the future as student housing and vice versa, thus minimising the risks from an oversupply of either type of accommodation.

Consequently, the delivery of PBSA and LSPBSL alongside self-contained homes within the RRGAs would contribute towards Camden's strategic housing target of 11,550 additional homes during the plan period. At the same time, it would reduce pressure on the local private rented market by releasing the equivalent number of dwellings for more general needs housing and contribute towards achieving a mixed and balanced neighbourhood in accordance with the London Plan.

Having established that there is a need for specialist forms of permanent housing, it is necessary to consider and identify the most appropriate locations for it. The London Plan (Policy H15) encourages boroughs to develop student accommodation in locations well connected to local services through walking, cycling and public transport as part of mixed-use regeneration schemes - such as Regis Road. Similarly, Policy H16 of the London Plan requires LSPBSL to be located in areas well connected to local services and employment by walking, cycling and public transport, and its design must not contribute to car dependency. Regis Road meets all these key criteria and as such, is ideally located for both PBSA and LSPBSL. It is critical, therefore, that the Camden Local Plan (particularly policies C1, C2, H1, H9 and H10) does not close off options for other forms of permanent housing such as these.

- Policy C2, *“Indicative Housing Capacity: A minimum of 1,000 additional ~~self-contained~~ homes, including self-contained homes.”*

Reason: The draft policy implies a cap of 1,000 additional homes, which is unnecessarily and unreasonably restrictive and undermines the Government's clear agenda to "build more homes". It is also at odds with London Plan policies, including Policy GG2 and Policy D3 that 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. Furthermore, it is noted that there is an inconsistency between draft Policy C2 and the recently adopted Regis Road SPD, insofar as the 1,000 net additional homes target in the SPD relates to the Regis Road Growth Area (which excludes Holmes Road depot), and the same target applies in Policy C2, which relates to Regis Road and the depot. Ergo, the site capacity within Policy C2 should be increased to reflect its larger site area with the inclusion of the depot, which is itself a large site.

- Policy C2, Infrastructure Requirements, "Development ~~must~~ *should*"...

Reason: The list of infrastructure requirements at points 23-33 requires a wide range of infrastructure that the Holmes Road depot and the various land parcels that make up Regis Road are required to deliver with no consideration or evidence that they are needed or indeed viable. The proposed infrastructure requirements should be supported by detailed capacity studies (to demonstrate that they are needed), triggers and funding mechanisms. In the absence thereof, the wording should be softened as indicated.

- Given the complexity of the land ownership of the Regis Road area, we request that additional wording is included in Policy C2 to acknowledge that comprehensive redevelopment for the area may come forward in phases throughout the lifetime of the plan.

Housing

As a consequence of the amendments sought to Policy C2 outlined above, the following policies should also be amended for consistency:

- **Policy H1 Maximising Housing Supply, Part B, 5.** - *"where sites are identified for development of permanent housing (~~particularly permanent self-contained housing~~) through a current planning permission or in a development plan, resisting development for an alternative use (other than a short-term meanwhile use compatible with subsequent permanent housing development), unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for ~~the identified form of~~ permanent housing., or (in the case of non-housing proposals) for any alternative form of permanent housing."*
- **Policy H9 Purpose-Built Student Accommodation, Part B, 2.** - *will not involve a site identified for self-contained housing through a current planning permission ~~or a development plan document~~, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing."*
- **Policy H10 Housing with shared facilities (including large-scale purpose-built shared living), Part B, 2.** - *will not involve a site identified for self-contained housing through a current planning permission ~~or a development plan document~~, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing."*



Open Space

Draft Policy SC4 (part C, 1.a-c) outlines standards for open space provision from residential, commercial and PBSA development. It should be expanded to include other forms of development, such as LSPBSL. Furthermore, the policy should clarify how the standards for public open space relate to the standards for child play space set out within the London Plan, and, where it's not practicable to provide all the required open space and play space on site, which should take precedence.

Summary

Overall, Joseph Homes support the broad principles of the draft policies relating to the future development of Regis Road. However, it is critical that the policies do not undermine the objectives for the area by being unduly prescriptive in the absence of robust evidence. We have therefore suggested some minor changes to the wording of various policies for soundness as outlined above.

We look forward to further engagement with the London Borough of Camden as the emerging Local Plan progresses through the plan making process.

Yours faithfully

Nick Belsten

Executive Director

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

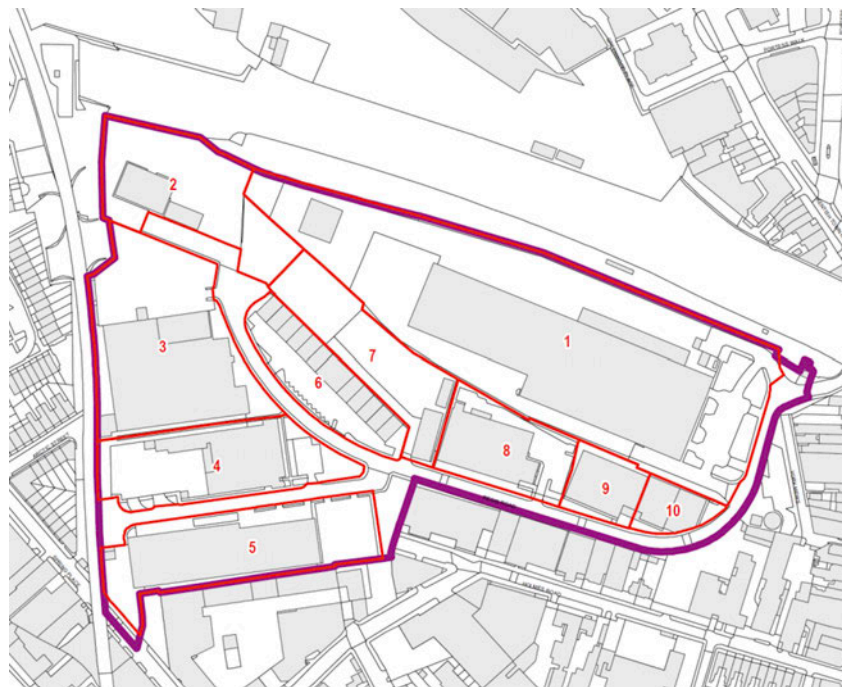
12 March 2024

To Whom It May Concern

Draft New Camden Local Plan Regulation 18 - Submission of Representations on behalf of Joseph Homes

On behalf of our client, Joseph Homes, we are writing to provide comments in response to the Council's consultation of the Regulation 18 version of the Draft Local Plan.

Joseph Homes are an award-winning housing developer operating within Greater London. They own a large portion of land within the Regis Road Growth Area in Kentish Town; namely sites 4 and 5 as shown on the Site Ownership Plan below:



Regis Road Site Ownership Plan

Other landowners within the Regis Road area include Yoo Capital, UPS, Bideford Ventures and Big Yellow. Joseph Homes are committed to working with both LB Camden and the neighbouring landowners and relevant stakeholders to regenerate the Regis Road area and deliver a comprehensive masterplan for wider site.

Regis Road is identified as an employment-led growth area within the Kentish Town Planning Framework, and this allocation is carried forward within the Draft Local Plan. In addition to the site allocation, the Draft Local Plan contains a number of policies which are relevant to the future development of the Regis Road area. It is important that these policies provide sufficient support and flexibility to allow a viable scheme for the site to come forward and ultimately be delivered.

The following paragraphs set out our comments on the Draft New Camden Local Plan on behalf of Joseph Homes.

Site Specific Policies (Draft Policies C1 (Central Camden) and C2 (Regis Road and Holmes Road Depot))

Joseph Homes are supportive of the general aims of draft policies C1 and C2, which identify Regis Road as an allocated site for mixed-use development.

Policy C1 states that the Regis Road and Murphy sites will be intensified to deliver a new neighbourhood with a mix of uses, with a combined 1,750 new homes alongside the delivery of a higher density provision of industry and logistics, community facilities, cultural and leisure uses and open space. The Council will expect development to be taken forward in accordance with the Kentish Town Planning Framework and the Kentish Town Neighbourhood Plan.

Policy C2 is specific to Regis Road and Holmes Road Depot, and confirms that the indicative capacity for this area will be 1,000 new homes along with high density employment uses (including industrial, warehousing, storage and logistics) and infrastructure requirements such as a link between Regis Road and Kentish Town Road and additional access points to the site.

We note that the current Draft Policy appears to consider Regis Road and Murphy Site as a single entity, referring to an overall housing requirement for both sites within Policy C1 and including almost identical requirements for the mix of uses set out under Policies C2 (Regis Road) and C3 (Murphy Site). We consider that this approach should be reconsidered and the Policy for each site should be site specific, acknowledging that the nature and character of each site is unique and that there should be different delivery expectations and requirements.

At present, the policy wording seems slightly unrealistic and requires the sites to deliver a number of uses which are potentially not compatible and a wide range of infrastructure with no consideration of whether this is actually needed or is viable. The policy wording should instead reflect the Council's up to date evidence base and outline the Council's specific requirements for employment and residential floorspace for each site to ensure this is reflective of the Borough's housing and employment needs. It should be made clear that the housing numbers set out in Policies C1 and C2 are indicative and that the appropriate density will be determined through detailed capacity assessment. The proposed infrastructure requirements should be supported by detailed capacity studies to demonstrate that they are actually needed.



We consider that a comprehensive Regis Road masterplan should be developed and reflected in a new Supplementary Planning Guidance (SPD) (which will include a Design Code) to inform development coming forward in the short, medium to long term and ensure appropriate design principles are followed and good levels of amenity provided. The SPD should be informed by the Council's evidence base which will inform the potential capacity of the site in respect of appropriate land uses, massing, phasing, infrastructure requirements and triggers and funding mechanisms. This will in turn inform the density which can be achieved and the number of residential units.

Housing

Paragraphs G and H of Policy C2 refer to the site re-providing the existing housing floorspace from the Holmes Road depot site as well as the required new housing provision across the wider scheme area. It further states that provision should be made for particular housing needs identified in Policy H6C where appropriate, and consider inclusion of affordable housing for older people, or other people with care or support requirements, as part or all of the overall affordable housing contribution.

In order to ensure the appropriate housing types are delivered, it is requested that the policy wording is amended to include additional flexibility and allow for a range of housing types to reflect the evidence base (including housing needs studies).

Land ownership

Given the complexity of the land ownership of the Regis Road area, we request that additional wording is included in Policy C2 to acknowledge that comprehensive redevelopment for the area may come forward in phases throughout the lifetime of the Local Plan.

Affordable housing (Draft Policy H4)

Policy H4 sets out the Council's expectation for the provision of affordable housing within developments according to a mix of affordable housing types i.e. 60% low-cost rented housing and 40% intermediate housing. However, it does not look at specific housing products, such as co-living, specialist housing, and student and how these could meet different needs. We request that Policy H4 is amended to include additional flexibility and allow for consideration of alternative housing products which meet an identified need.

Summary

Overall, Joseph Homes support the broad principles of the draft policies relating to the future development of Regis Road, however, it is crucial that the policies are specific to the Regis Road site, are supported by relevant infrastructure capacity studies and reflect the Council's up to date evidence base to ensure that future regeneration proposals meet the needs of the Borough and are ultimately deliverable.

If you have any queries in relation to the representations made on behalf of Joseph Homes, please do not hesitate to contact myself or my colleague Mel Mantell.



Yours sincerely

[Redacted signature]

Nick Belsten

[Redacted contact information]

[Redacted footer information]

Date: Fri, 27 Jun 2025 16:59:15 +0100

From: anna Moszynska

To: [redacted]

Subject: Camden Local Plan Proposal re C27 site adjacent to Constable House, NW3

I am writing about the proposed travellers' accommodation provision adjacent to Constable House, Eton College Road, [redacted postcode].

I am a resident at [redacted]

I wish to oppose this proposal on the following grounds:

The area is already crowded in terms of population as much of the street is occupied by blocks of flats which means that the road is already densely populated. It will become more so with the 7 high storey blocks of new flats that are currently being constructed at the end of the road, near Chalk Farm tube station

Given this, it is essential that no loss of trees and play areas should occur for the health of the community and particularly the flat dwellers in Constable House.

The proposed settlement would be overlooked by the new 7 storey flats and by the existing flat residents in Eton College Road. This is unacceptable to them.

The proposed area is far too small to be considered in the first place. The movement of vehicles in and out would be highly cumbersome and would put further pressure on a busy main road adjacent.

The impact of such a settlement would have a deleterious effect on the community. There is a heavy footfall of passers by who would overlook the settlement and existing residents would be affected in an area that already faces issues with crime.

Thank you for reconsidering.

Yours faithfully

Anna Ludlow (Moszynska)

[\[redacted email\]](#)

[redacted signature]

Date: Fri, 27 Jun 2025 15:59:45 +0000
From: Seema Merchant
To: planningpolicy@camden.gov.uk
Subject: Re gypsy and traveller sits by constable house

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

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

I would like to object to this as in an already busy area this adds to congestion . I would suggest that this space be better used as a playground space for the local community .

Seema Perez
[redacted address]
[redacted postcode]
Sent from my iPhone

Date: Fri, 27 Jun 2025 15:59:56 +0000

From: Judith Leeb

To: PlanningPolicy

Subject: Objection to Local Draft Plan, in particular to the Recycling Center being built on the Police Parking Site.

Dear Camden Council Regeneration and Planning Teams,

I am a [REDACTED] who brought up her children here. I am writing to you 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 I fully support Camden's commitment to sustainability and responsible waste management, I am extremely concerned about the proposed location of the facility and its potential negative impacts on our community.

I believe the Local Draft Plan is not sound and justified:

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, its nursery, and the Collège Français Bilingue de Londres (CFBL). 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, and would appreciate being informed of further decisions. It is in particular important that we residents of Holmes Road will personally be consulted - to make sure that the interests of the residents of Holmes Road in particular will be considered.

Kind regards,

Date: Fri, 27 Jun 2025 16:59:46 +0100

From: Sarah Eley

To: [redacted]

Subject: Camden Local Plan 2024

Dear Planning Policy team

I am writing concerning 2 issues in the draft Local Plan

(1) Allocation for Land east of Constable House, NW3 3QA as accommodation for gypsies and travellers: the site is wholly unsuitable for this proposed development..

- it is green space which is for the use of the existing residents in the block adjacent to it. Green space is at a premium in a densely developed Borough like Camden. Developing on green space will impact on the amenity of the existing residents.
- there are issues for privacy and overlooking for new residents in this location, and existing residents in the housing blocks. New development in this location would impact on privacy and amenity.
- there is poor boundary treatment for the proposed site, which again would not create good amenity.
- there is no indication how vehicles will be accommodated on the site, and how they will impact on Adelaide Road
- there is no indication whether this site would adequately meet the needs of gypsies and travellers, as frequently their living accommodation needs have non-traditional layouts.
- proposed built structures are unlikely to be suitable for the heritage assets in the area

I do not consider that the Evidence Base which supports this allocation in the Local Plan is adequate and the review must be undertaken again.

(2) Regis Road master plan

I note that the recycling centre is being relocated further east towards Kentish Town high street as part of the Regis Road masterplan.

This is too close for existing dwellings and the primary school neighbouring the site on Holmes Road: they are offered no protection from environmental pollution which results from recycling centres.

I also have concerns about servicing arrangements - Holmes Road does not have the capacity for additional traffic, already being very busy from the developments which have taken place on this road over the last decade or so.

I therefore object to these elements of the draft Local Plan and seek further review,

thanks

Sarah Eley

[redacted address] [redacted postcode]

Highgate Society response to the Draft Camden Local Plan Consultation

Chapter 1 - Introduction

Duty to Cooperate

1.28. states that the Council has engaged with neighbouring boroughs. However, other than the statement that this has been done, there seems to be very little evidence of how this has influenced aspects of the plan. For example:

- The accompanying map shows Camden as an island without anything around it, even indicatively.
- Kilburn High Road and Highgate High Street are shown only as being one sided.
- When considering schools and school traffic, or other major trip attractors, influences outside the borough need to be considered.

The practical implications on the plan content of the engagement with other neighbouring boroughs need further consideration and to be detailed within the plan.

Chapter 2 - Development Strategy

Policy DS1 Delivering Healthy and Sustainable Development

A.2. Risk that net zero would conflict with other principles of good design, conservation, protection of historic environment.

B. Citizen Scientists do not appear to meet the S106 rules for contributions to "reasonably relate" to the development in question.

2.36. and 2.37. The section refers to a pilot for the Citizen Scientists scheme but our understanding is that the pilot scheme finished in September 2024. It is understood that other Citizen Scientist schemes may follow. We believe these schemes have the potential to improve communication with residents.

Include a section on "Community Organisations" here as the section on Citizen Scientists suggests other routes to local resident engagement should also be included.

Camden has a multitude of community organisations such as residents and civic groups. The local plan should acknowledge the existence of groups such as the Heath & Hampstead Society, the Highgate Society, Covent Garden Community Association, Belsize Society, Camden Civic Society and Seven Dials Trust.

The London Forum exists as a forum for London's civic and amenity groups, but Camden could seek to develop a Camden focused group.

The local plan should highlight the potential benefits of early involvement and consultation with residents through these "grassroots" organisations.

Chapter 6 - North Camden

6.4. states: "There are also a number of neighbourhood centres in the North of the borough providing a more local shopping role, including Highgate High Street, which is on the boundary between Camden and Haringey." In respect of Highgate some further explanation would be helpful. A continual obstacle to holistic planning for the Highgate community is that half of the shopping centre in Highgate is within the Borough of Haringey.

6.6. states that: “However, despite the abundance of open space in the area, Dartmouth Park and Frognal remain comparatively less well served by public open space.” Much of Dartmouth Park is actually very close to Hampstead Heath and Waterlow Park n.b. entrance to the park from Dartmouth Park Hill.

The Highgate N6 postcode area also has a high concentration of schools where significant issues exist concerning the school run. While most are located just over the border in Haringey (Channing Senior School, Highgate School Senior and Junior sites, St Michaels School) their traffic impacts significantly on Camden and needs to be considered. There are approximately 5,500 pupils who attend schools in the Highgate Village area.(1) Probably the majority commute into the area.

(1)Highgate School 1,980; St Aloysius School 1,089; Channing School 1,028; St Michaels C of E Primary School 427; St Joseph’s Catholic School 470; Highgate Primary School 433 pupils.

6.8. it would be worth adding that the Highgate Neighbourhood plan covers both the Camden and Haringey sides of Highgate.

6.9. An Infrastructure delivery Plan is mentioned which we are not aware of.

Policy N1 North Camden – Retail and Town Centres

Please can a specific reference be made to the need to support the Highgate Village Town centre through appropriate public realm refurbishment and enhancement, following the removal of the 271 bus turnaround area in the centre of the Highgate shopping area? See also the above about the Infrastructure Delivery Plan.

13.20. states: “For developments raising particularly complex construction or management issues, the Council will seek a Construction Management Bond, secured through a planning obligation and paid to the Council by the developer. This will be returned on completion of the works providing there has been no breaches of the Construction Management Plan.” This arrangement is welcome, and the potential use of Bonds to secure better compliance with developer obligations across a wider range of issues should be explored.

N1.F1 Infrastructure

Given such controversy over the DPHN it is not appropriate to create a dependency where local planning is used to substantiate experimental traffic measures. This policy should be removed, or qualified as subject to positive local support otherwise the credibility of the Local Plan as a consensus document will be undermined and devalued.

Chapter 7 – Meeting Housing Needs

Introduction:

This Policy is lengthy, running to 365 sections and therefore the Society’s response is limited to comments on the policies to which it objects, rather than commenting on each policy and section. Where the Society is silent on any Policy, this indicates the Policy is noted and no comment is made.

Policy H1 Maximising Housing supply

Whilst it is understood that the requirement to provide 11,550 additional new homes by 2041 is driven at National and Regional level, the Society feels this is an unrealistic target in a mature urban area such as Camden. Camden is a heavily developed borough and whilst developments of railway land, such as the Murphy’s Yard and the HS2 site behind Euston, have limited impact on existing neighbourhoods, there appears little opportunity to provide this quantum of

additional homes without impacting on the quality of life of the current occupants, causing loss of employment or other important non housing uses, or damaging Camden's valuable open spaces and heritage assets. The Society is of the view that Camden should ensure the rush for additional homes does not cause irreversible damage to the fabric and community structure of the Borough.

Policy H1B

The council will provide sufficient new homes to meet needs

The principles of this Policy are welcomed by the Society with the following comments

H1B.2 Whilst the Society supports housing for those with specific needs, it strongly objects to the provision of any more student housing. The reasons for this are given in the response to H9 below

H1B.3 The policy of returning vacant homes to use is to be welcomed but this is a resource hungry activity with most vacant homes having to be dealt with on an individual basis, with complex ownership patterns (absentee landlords etc), and in poor condition. Camden needs to identify and provide suitable resources to enable this Policy to be delivered.

H1B.5 In terms of retaining housing approvals, if this Policy prevents land banking by developers, it is welcomed by the Society. However, this clause appears to apply rigid housing only policies to development and does not allow sufficient flexibility for the provision of mixed use developments. Large housing schemes need supporting infrastructure built into them in the form of services, facilities, amenity space, and even employment.

H1B.6 Optimising provision of permanent housing in underused sites does seem to suggest that Camden is introducing a policy of densification, whereby current low rise, low density schemes could be replaced by high rise "regeneration" through Community Investment Programmes. This is dealt with in more detail in the response to Policy H7.

H1B.7 Optimising design and heritage is welcomed, as also are space standards. However, good design can be considerably compromised by developer's economic pressures diluting the approved schemes, including the use of "signature designers" at the planning stage only. In terms of optimising delivery there should be an awareness of the damage tall building do, however well designed, to the environment round them, adjoining heritage assets and also in terms of living conditions for families.

Policy H1C Adjustment to mix, type of housing etc.

This policy allows a degree of flexibility in approach which is to be welcomed, but the reliance on "financial viability" based on developer's profit driven needs may not align with the mix identified to meet housing needs. The Society has seen examples (in another borough) where the provision of student housing and smaller units results in 74% of the units provided being studios and one bed flats (see also section H9). A scheme with this proportion of small units will not comply with Policy H1B above by addressing the need for family units and will be socially divisive. The Society would like to see the Policy clarified and strengthened so provision of housing does not just become a numbers game of housing stats regardless of size of unit, but actually meets the identified needs, particularly the need for family and affordable housing.

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

H2A Housing in non-residential developments

This policy is generally supported in principle by the Society where “living over the shops” reflects the traditional forms of building within High Street.

H2B.1 50% housing in commercial developments

However, there could be concerns as to how the 50% can be achieved and whether it is applicable to relatively small schemes. There is concern that this will lead to much higher developments. Tall buildings are environmentally damaging and also are historically problematic in terms of family accommodation and social rented accommodation.

Policy H3 Protecting permanent existing homes

H3A Retain all existing residential floorspace

This seems to apply across all forms of tenure, but bearing in mind the substantial loss of social rent (3,000 homes) protection needs putting in place to protect social rent. What is regrettable is there no mention of “Right to Buy”, the major source of loss of social rented accommodation in the Plan. Whilst it is accepted that the Government has no plans to withdraw this legislation, and therefore Camden’s ability to protect its existing social rent sector is limited, it is felt that Camden should be working to retain not just residential floorspace as a whole, but specifically social rent floor space.

Policy H4 Maximising the supply of affordable housing

H4.A 50% target for affordable housing

Camden states in Policy H1 that it will be supporting the London Plans’ target of 50% affordable housing. There are a number of issues with this policy, namely:

- In this Policy Camden states their target for affordable housing is 3,000. As a percentage of the 11,500 target stated in H1 above, this works out at 26%. Clarification is required.
- The methods of delivery of new homes appears to be a continuation of the current existing formula i.e. developer led schemes with a percentage of affordable housing to be agreed via viability assessments. Those who work within the housing delivery sector are aware that the proportion of affordable housing in only very rare cases reaches the targets set either at regional or local level. Viability assessments, largely due to rising construction costs, are regularly producing figures of 10% and lower and rarely make even 20%.
- There is then the problem of the split between social/London affordable rent and intermediate rent, Camden are stating a 60/40 split. Is this achievable?
- The flexibility of provision for small developments is welcomed. Many sites within Camden are “windfall sites” and the usefulness of these is recognised by policy H2 of the London Plan but small scale, non-professional developers often struggle with the complexities of the current planning system. More support for this sector should be given
- In terms of mix of affordable housing, the use of this description for intermediate provision can be misleading. Camden housing is expensive, whether for rent or buy, and affordable rent is usually in the range of 80% of market rent. Market rent in Camden is unaffordable for many and 80% of affordable will still remain unaffordable

H4D Alternative forms of tenure

Whilst shared housing and build to rent are welcome as providing diversity in the housing market, student housing is not. This Society’s comments on this are dealt with under Policy H9

Policy H5 Protecting and improving affordable housing.

H5.A protect, improve affordable housing

This is welcome in principle but Camden needs to ensure through its inspection of properties of its own and those of other landlords, including RSL's are maintained in good condition. In Camden's case, a commitment within the Plan to this would be welcome.

As above, this policy does not address the key element of loss of affordable housing through the "Right to Buy" legislation. Whilst policies are in place to protect Camden's affordable housing from loss from other sources, it is completely silent on the losses through "Right to Buy". This is now recognised as the major cause of loss of affordable units throughout the country. The Society would like to see Camden working closely with other boroughs to look at ways to actively retain this vital sector of housing provision through Local Plans and working towards a review at Government level of this legislation.

H5.C This section covers the Community Investment Programme (CIP) which, although it has been in place since 2010, has the potential to cause huge damage to the social fabric of established communities. Coupled with this is the fact that that most regeneration programmes result in substantially increased density which leads to tower blocks, universally unpopular and as above unsuitable for families and social rent. Concern about tower blocks has been raised in recent GLA reports. There appears to have been no audit of this programme, which, having operated for 15 years would be expected.

Through the Community Investment Programme existing homes, many in social rent will be demolished. The Society has major concerns as to what this will do to the cohesion of established communities particularly in large schemes and the distress this will cause to the residents, particularly those who have lived in their properties for lengthy periods and look on these as lifetime homes. Although Camden undertake to rehouse with their statement that "Over the course of the programme, there may be redistribution of occupiers and of affordable housing floorspace from one part of an estate to another, or even from one estate to another". Bearing in mind the lack of availability of social rent properties, it is doubtful that sufficient units will be available within Camden and residents could be dispersed further afield. The Plan is also silent on the status of leaseholders.

Regeneration of estates generally means demolition and reconstruction, this being more profitable for developers with incentives such as with 0% VAT rather than 20% for refurbishment, cheaper and faster building costs and being able to cram more buildings on a site through construction of tall buildings. However, it is not sustainable in terms of embodied energy and impact on communities, and the Society feels retrofit should be prioritised with a Whole Life Cycle costing carried out.

Current schemes under CIP, such as the current Bacton Estate Regeneration propose high rise buildings. The impact of these can be extremely damaging to Heritage Assets (e.g. Hampstead Heath), thus conflicting with Chapter 12, Design and Heritage, of this Plan. Tower blocks have previously been deemed as unsuitable for families and social rent as illustrated by the moratorium on them on high housing applied by the GLC. We understand 2 reports expressing these concerns have recently been produced by the GLA.

H5D. The concern with this policy is that regeneration will result in very few if any additional genuinely affordable units of housing following the viability assessment as stated above whilst causing immense damage to existing communities whilst putting great pressure on existing infrastructure and services.

Policy H6 Housing Mix

The policies proposed in this section are generally welcomed but, as above, too many developments are produced with a majority of small units which are not suitable for family accommodation. Much of this can arise from alternative forms of tenure such as student housing (as below) or shared living. Where there is a predominance of units of this size proposed the mix of the rest of the site should be adjusted to better reflect need.

Policy H9 Student Accommodation

Student Housing is dealt with as a separate policy from other forms of shared tenure covered in Policy H4. The Society strongly believes that this is a sector of the housing market should not be supported for the following reasons

- The GLA requirement of 3,500 units of student housing per annum is out of date. This figure is obtained from the London Plan 2021 which renders Camden's requirement of 200 units per annum similarly out of date.
- Since 2021 there have been a steady drop in numbers of HE students thus creating financial problems within this sector. Consequently, the numbers of students requiring purpose built accommodation has substantially decreased, but this is not only due to the drop in numbers of students but also due to increasing numbers of students living at home, and a severe reduction in number of overseas students, in particular from China and Europe post Brexit. This is confirmed by a 2025 Knight Frank report.
- The 2021 target figure of the provision of 3,500 units per annum has been considerably exceeded since then. Over the period of the Plan, 21,000 properties were targeted to be built. Knight Frank have reported that in fact 37,678 new spaces have been built or approved over this period, almost double the predicted requirement over this period.
- Coupled with this, Camden maintain that the enormous overprovision over and above the target set within the London the Plan indicates that this market is picking up after a steady decline, but this is driven more by profitability of this form of development than by demonstrable need.
- The construction of student housing takes up valuable land which could otherwise be used for self-contained housing units to meet demand.
- It skews the affordable housing percentage as this is assessed on the residue of the site excluding the student housing. This gives a false picture of percentage of affordable housing being met.
- It also skews the mix. On another scheme in a nearby borough with a substantial block the number of studio and one bed apartments is 74% of the total. This is simply not meeting housing needs for family housing.
- This is a profitable sector for developers with a 4% tax rebate, exemption from other requirements including affordable housing, provision of amenity space and reduced building regulations requirements. This is illustrated not only by marketing material aimed at attracting investment which quotes annual returns of 10%, but also as above by the fact that the GLA's target figures have been exceeded by such a large margin.
- The cost of accommodation in these blocks is extortionate and unaffordable for any other than the most wealthy. The Hanger Lane Student Housing Scheme, currently being constructed is offering rooms from £380/week. Over a 41 week term this works out at over £15,500. Although a requirement for affordable units can be required, this is often off site, and where this is not possible, a commuted sum is required. This does not create affordable units on site.

- Should the student housing, in future times prove uneconomic, the owner could convert these into substandard residential units, possibly through Permitted Development Rights. The Council should ensure a legal agreement is in place to prevent this.

Policy H11

Accommodation for travellers

The Society welcomes the continuing support for existing travellers but feels the target of between 11 new pitches by 2031/32 and 19 new pitches by 2041 is unrealistic due to limited availability of suitable sites as demonstrated by the failure to meet previous targets.

There is also concern that this may open up a conflict between the provision of new pitches which are essentially extremely low density and policy H1 which requires maximisation of housing supply. Camden should look at each potential pitch and carry out an exercise to investigate how many traditional housing units could be accommodated on this space and make a judgement from this.

Conclusion:

The Highgate Society has identified what it considers the following areas of concern with Chapter 7 of Camden's New Local Plan:

1. The major concern is that many of the policies in this section are based on the 2021 London Plan which is now out of date. The new London Plan has just finished its pre consultation exercise.
2. The Society believes the target of 11,500 additional new homes is unachievable due to lack of site availability, lack of construction skills, inflating construction costs and reliance on developer delivery.
3. The mixed use although welcome should be applied not just to commercial properties but residential as well. The 100% residential policy could lead to large estates which become single use ghettos without supporting infrastructure.
4. The target of 50% affordable housing is unachievable and contradicts the quantum of affordable housing Camden say they will provide.
5. No mention is made of loss of affordable units through Right to Buy.
6. Although it has been running since 2010, there is no audit of what the Community Investment Programme actually delivers and its costs. By moving people from their homes CIP is responsible for destroying established communities. In view of this, of embodied energy and other issues, retrofitting should be prioritised over demolition and rebuild.
7. The provision of student housing should be reviewed with a current assessment as to whether there is any demand and Camden should ask itself whether it really does want to be seen to be enabling such luxury accommodation when there is so much need in the borough.

Chapter 8 – Responding to Climate Change

8.16. and generally: We would suggest the council seeks to condition post-completion verification that the retrofit work has been carried out. A balance will need to be struck depending on the scale of development. On larger developments the Council should seek evidence of the certification of retrofits e.g. PassiveHouse, AECB standards for the building or an appropriate percentage of units (as certification costs money).

Policy CC5.C. This should explicitly mention improving air tightness of buildings and prioritise mechanical ventilation, specifically with air filtration and heat recovery. Approximately 15% of the average house's heat loss is through air leakage.

8.6. Recommend this is worded to refer explicitly to conservation / Listed properties as it is unrealistic / far too constricting for other properties.

8.66. Suggest the council considers referring explicitly to vacuum glazing as an encouraged and supremely better performance alternative to single glazing / secondary glazing in specific heritage contexts. Heritage should not be a reason to avoid retrofit, but an opportunity to apply creative means to lower energy consumption and improve occupant comfort. For the reader's benefit, a vacuum glass pane has similar reflective/refractive properties as a single glazed pane (how light passes through a window is sometimes a conservation consideration), but loses 80-92% less heat.

8.69. 'Draught-proofed' is anachronistic and implies sealing only gaps around windows and doors. 'Achieves a high level of airtightness' refers to the performance of the entire built fabric - windows, doors, but also walls, roofs, floors - and this should be highlighted.

CC6.B. Suggest this is controlled by condition.

CC8.A and 8.113. Reference should also be made to construction build-ups that naturally reduce overheating potential, e.g. by using materials with high decrement delay (e.g. dense insulations like wood fibre have significant performance advantages for reducing overheating, compared with petrochemical insulations).

Chapter 9 - Delivering an Inclusive Economy

In general we welcome the provisions of this chapter.

Chapter 10 - Supporting Camden's Communities

We generally support this chapter but would like to point out that Highgate is a single community, but seriously disadvantaged as regards holistic planning through being divided between Camden, Haringey and Islington. It is essential that Camden commits to working with the other local authorities to ensure that the loss of a community facility, pub, open space, etc., in any part of the Highgate area will not work to the disadvantage of the Camden or other parts of Highgate through its impact? For example, although an important community facility may only be in one borough, its loss will affect the whole community, whatever borough it is in: Co-operation between the local authorities covering Highgate is critical to the success of the plan.

Chapter 11: The Natural Environment

In general we welcome the provisions of this chapter.

11.3 & 4. It should be made clearer that the individual garden spaces in the Borough, large and small, together form a vital ecological corridor through and beyond the Borough, contributing to the viability not only of ecology in Camden, but of a wider area of London.

Policy NE1.A. The Natural Environment

2. The significant area of large gardens around Hampstead Heath are currently mainly designated as Private Open Space. We would welcome a commitment to upgrading them to Metropolitan Open Land. MOL 11.6 should therefore commit not only to "protecting the openness and character" of Metropolitan Open Land, but to expanding its area where possible.

5. In view of the major ecological value and potential of the large gardens adjoining Hampstead Heath – some of them extremely large - we would wish to see a commitment to working with the owners of these gardens to encourage them to commit to managing them for wildlife as part of the ecological corridor.

On the commitment to protecting other undeveloped areas, including gardens (11.13), it is our experience that a major threat to these spaces is the proliferation of home offices (particularly since Covid) and other large outbuildings such as wellness studios, home golf studios, and swimming pools which, in back gardens, are permitted development, as are other outbuildings up to a certain size. We would welcome the inclusion of a commitment to place Article 4 Directions on back gardens, to remove permitted development rights which could cumulatively result in long-term degradation of the ecological corridor of which gardens are an essential part.

Policy NE2. Biodiversity

A.1. While we welcome the commitment to require that all major schemes, and “those that have the potential to adversely impact biodiversity”, should require an ecological assessment, we consider that this commitment needs to be strengthened to address the potential gradual cumulative impact of more minor schemes. The contribution of even smaller sites, as elements of the ecological corridor, should be a factor in assessing potential impact and the precedent such consents could set for its progressive degradation.

A.4. Where green roofs are provided, or required, it is essential that arrangements are in place to ensure that they are regularly monitored for maintenance in good condition; for example, by requiring the annual submission of a photograph of the green roof to show that it continues to fulfil the purpose for which it was created. Therefore (A.8), monitoring of schemes should include that of maintenance of green roofs.

Protecting Biodiversity

11.37. Where there is likely to be adverse impact on biodiversity, a comprehensive survey of the flora and fauna is essential. In our experience, this too often comprises a visit by an “ecologist” over a short period, of no more than a few days, in all likelihood during the daytime. As wildlife of all types appears at different times and seasons, often for only a short period, it is essential that a minimum period for ecological survey should be required in each case; for larger sites, and particularly those which form a part of an ecological corridor or are adjacent to known sites of ecological value, this should be of no shorter duration than a full season, or the presence of critical species, possibly of importance or rarity, is likely to be missed, resulting in harm to the biodiversity of the site and the area.

11.40. We suggest that this be amended to read “at least 50% of total planting should, be native species.”

Policy NE3. Tree Planting and Protection

A.1. We suggest that the word “significant” be omitted. If a tree is of “amenity, historic, cultural and / or ecological value”, it should be deemed to be “significant”, and justification should be required for its removal.

A.3. Clarify “where appropriate”.

A.5. It is our repeated experience that monitoring of tree protection measures on a development site is essential, since not all developers can be relied upon to ensure that they are observed.

A.6. As regards tree replacement, we would be concerned that simply replacing one lost with two new ones may be insufficient; for example, replacing a 100-year-old tree with two 5-year-old saplings will result in a short to medium term loss in overall biodiversity. In order to avoid this, we suggest that a “year equivalent” planting should be required; in this way, if a 100-year-old tree is to be lost, it should be replaced, on site if possible but, if not, as close to the site as feasible, by ten 10-year-old saplings or 20 5-year-old saplings. Where this is not possible, a “year equivalent” as close as possible to the age of the felled tree should be sought. (This is also relevant to “Tree Protection” 11.64-65).

Tree Protection

11.57. Our comments above are also relevant to this paragraph requiring developers to minimise adverse impacts and ensure tree protection measures. In our experience, regular monitoring during development is essential. We consider that requiring developers merely “to have regard” to tree protection (11.59) is in itself sufficient to ensure compliance, and that a regular monitoring programme is necessary.

11.70. Again, while it is essential to require “a robust management regime” for newly planted trees, landowners cannot always be relied upon to report the failure of new planting, and monitoring is essential. Perhaps local community groups could have a role in reporting newly-planted trees which fail to thrive.

Hydrological Risk Assessment

11.78. We welcome this section, but consider it needs to be made clearer that the implications go well beyond the mere issue of “water quality” (11.78). It is essential that the “adverse effects of groundwater diversion” should include the impact of basements on ground water flow and consequent impacts on gardens and trees both within and beyond the site, and on neighbouring properties. In an area such as the Hampstead-Highgate Ridge, the hydrology and geology is highly complex, there are many underground streams and springs known, and new ones consistently appear, often only apparent once basement excavations have commenced. Basement Impact Assessments must therefore be comprehensive and thorough, and take into account the hydrology of the surrounding area and not just the site alone; we have experience of cases where large sites have received minimal borehole investigation and the hydrology of the surrounding area has been ignored, resulting in damage to neighbouring properties.

Chapter 12 - Design and Heritage

Policy D1 Achieving Design Excellence

B.20. Design is of crucial importance to the wider community. We suggest adding the following point:

“be able to demonstrate meaningful community engagement, in accordance with para. 137 of the NPPF, given the high priority placed upon heritage and design by the community, and the often significant level of local knowledge and expertise in local history and character possessed by local groups actively engaged in the planning process, not least because such early engagement could result in a fast planning process by eliminating objections resulting from failure to carry out such consultation.”

12.12. add further bullet point:

“the use of Development Management Forums to ensure effective community input will be considered when the proposals are of demonstrably of a high level of community interest.”

12.22. Community Engagement: we support these aims, but would like to see a specific reference to the necessity of applicants, particularly of more contentious schemes, observing the requirements of para. 137 of the NPPF (see above). Add this line after “consideration” (line 7).

“this is particularly applicable to smaller-scale developments in sensitive areas such as Conservation Areas, which can have a disproportionately negative impact even though they are not large-scale.”

Independent Design Review

Our experience shows that the public do not necessarily have confidence in the deliberations of Design Review Panels, who rarely take the community’s viewpoint into account, and often issue an opinion favourable to a development before it has been put out for public consultation. This can result in the community feeling “stitched up”. We suggest adding to 12.26.:

“Where the proposal is of demonstrably high public interest, a Design review Panel would be expected to familiarise itself with the community viewpoint prior, take it into account when making its decision and, where appropriate, allow community representatives to make their case at Design Review Panel Meetings.”

This is particularly important if an applicant is afforded the opportunity to address a Design review Panel.

Policy D2 Tall Buildings

A. We are concerned that simply stating a blanket height for tall buildings of 30m outside the Central Activities Zone could still result in unacceptable impacts on sensitive areas. A lower limit should be specified for developments within a certain distance from Open Spaces, Conservation Areas, etc. This is to some extent addressed by 12.87. below, but should be flagged up at this point too.

C11. After “overshadows”, add:

“or affects the character of amenity of”, since tall buildings can cause substantial harm without actually overshadowing.”.

We, and other local community groups, are consistently concerned at the impreciseness of the term “highest design quality”, which is in our experience too often decided upon by the applicant themselves, or is determined by the local authority without reference to community views of the quality of the individual case. Community input into the assessment of “design quality” must be an integral element of the overall planning process.

Design of Housing

Policy D3 A. Our comments above regarding the definition of “high quality” apply both here and elsewhere. The applicant cannot be expected to judge “high quality” impartially. This must be judged by an independent Design Panel, but that panel must be able to see the reactions of community consultees before making its recommendation. Failing this, as observed above, the community’s confidence in the process will be severely harmed if a Design Panel makes its decision without first seeing the outcome of public consultation, particularly in the case of large or sensitive developments. This is particularly applicable to applicants with regard to 12.43.

Policy D.4 Extensions and alterations to existing buildings

A. In view of the urgent need for new housing units, we suggest a fourth proviso:

“4. In view of the urgent need for additional housing units, priority will be given to the provision of these over and above extensions to single units.”

12.71. Add: “and any adverse visual impact on the terrace, or on the wider streetscape.”

Policy D5 -The Historic Environment

We generally strongly support this policy.

M. Listed Buildings.

The current list of heritage assets is not a fixed one. Add a fifth point:

“5. take the opportunity to add buildings or other heritage assets to the Statutory or Local List when such steps can be taken.”

Enhancing the Historic Environment

12.77. It is essential to ensure that hitherto unrecorded heritage assets, whether above or below ground, are taken account of during the development process. While for archaeological assets this is well covered by 12.100, we would suggest that this is strengthened to ensure that current unrecorded heritage is looked for and taken account of as a part of the overall development process and that, particularly in the case of older buildings, the possible presence of hidden earlier structures should be given due weight when formulating proposals.

Archaeology

12.100-107. We strongly support this policy, which we trust will not be weakened. 12.103 on the likelihood of unknown archaeological sites occurring even in Tier 3 and 4 areas, is particularly important. It could be made clearer that this is likely because patterns of earlier settlement, particularly of the prehistoric, Roman and Saxon periods, often do not relate to the known later pattern of settlement, and that therefore such sites can be expected anywhere. Indeed, since the Historic Monuments Record is based only on known archaeological sites and finds, and the more suburban the area, the less archaeological work has in the past been carried out in them, it is particularly important to assess the archaeological potential of sites, and particularly larger ones, in these areas, by trial archaeological investigations, since in these areas, as the policy acknowledges, the Historic Monuments Record will be deficient or even absent. The provision for adequate investigation of Tier 4 sites with archaeological potential is therefore essential.

12.107. Since, as pointed out above, the Historic Monuments Record for any areas will be inadequate or even absent, this is a further area where community involvement and engagement is important. Local historical, archaeological and amenity groups have considerable knowledge of the archaeological potential of their areas; indeed, it has been our own experience that professional archaeological consultants have dismissed the archaeological potential of sites where we indicated that investigation was, in our view necessary, with the result that archaeological remains have been exposed during the development process and lost because no time was allowed to record them before their destruction.

We would therefore ask that there should be a requirement for heritage and archaeological consultants to liaise with relevant local heritage and community groups as a part of their assessment of a site,

Policy D.8 Shopfronts

While in general we strongly support this section, we would once again flag up our concern that the requirement for “a high standard of design” needs more specific criteria and safeguards. In our view it is, again, important to ensure adequate pre-application community engagement in judging whether applications, however “high” the standards claimed for them by applicants, are actually in sympathy with the heritage and character of an area.

Chapter 13 – Protecting Amenity

Policy A1 Protecting Amenity

The terms planning obligation, legal agreement and S106 agreement seem to be fairly interchangeable throughout the chapter – we assume they all refer to S106 agreements. NB planning conditions can only apply to on-site issues and so off site issues must be covered by legal agreements etc.

While resistance to unacceptable harm is to be applauded, there is no definition of what is considered to be “unacceptable” and so this is left wide open to subjective opinion and negotiation regarding the balance of needs as noted above. Although a general definition could be difficult in this context, is it possible to create a series of parameters (in addition to those on noise and air quality) to indicate to developers at the start of the process that there are certain red lines that cannot be crossed? This might save time for applicants and officers.

As Camden is a densely populated central London location with many businesses operating close to residential sites the Agent of Change principle makes sense.

Sunlight, daylight and overshadowing

13.7. Who decides when impacts are potentially negative?

Given that BRE guidance is used as an objective standard, we strongly believe that BRE should not submit reports on behalf of applicants (which happens) as this is not objective, but is likely to be perceived to be.

Artificial light

The Amenity SPD says permission is needed if lighting (inc. supporting structures) substantially affects the external appearance of a building. This is a very narrow requirement - it should apply to all lighting schemes with a potential to cause nuisance.

There should be special consideration for historic buildings and buildings of architectural interest and special Sport England guidance for sports grounds and floodlighting. The Agent of Change principle should apply to artificial light and unacceptable harm should not be permitted. Camden’s Nature Conservation Officer can advise on impact on biodiversity and wildlife.

Cumulative impact of construction and damage to highways

13.16. States that CMPs should be submitted at the “earliest opportunity in the planning application process” and include input from appointed contractors and that they will “be secured via planning obligations”. This confirms that a CMP is only expected after approval has been granted. However in many cases, it will be clear to planning officers that there will be access issues, on site storage issues etc. right from the beginning of the project. It is not acceptable that these are put to one side until the development has been approved. Where it is clear there will be issues these should be addressed before approval is given.

13.17. Evidence of neighbourhood consultation process should be submitted, or the Council should canvas neighbours to see if this has actually taken place.

13.18. States that the Camden CMP Pro Forma Template must be used by the applicant and that the information should be proportionate to the process and transport requirements are based on the TfL Construction Logistics Plan. However Camden’s Amenity SPD says this is not enough by itself – the cumulative impact on local amenity must also be taken into account.

13.19. “significant impact on amenity” should be clearly defined here. Also according to the Amenity SPD, the Construction Working Group should include local residents, possibly a Council nominee and a community liaison officer. The make up of the Working Group should be included in this point.

13.20. It would be helpful to applicants if there were a scale of charges available for construction implementation contributions and monitoring fees.

We support Construction Management Bonds for “complex construction or management issues but why only relating to breaches of the CMP – the bonds should cover all damage caused by the development - and an amount held for a number of years in case any problems arise subsequently e.g. subsidence as a result of the build-up of blocked groundwater.

Water and wastewater infrastructures

Impacts on groundwater should also be covered as they are very important in the North of Camden.

13.33. “Developers may be required to demonstrate there is adequate infrastructure on and off site” Why only “may” - we believe it should be mandatory for all major applications and others on a case-by-case basis.

13.35. “we will use planning conditions and/or obligations requiring developers to provide secure mitigation and compensatory measures which must be completed prior to occupation of the development.” Something this important should be dealt with at the planning application stage and not left until after permission has been granted.

We believe that Water and wastewater infrastructures is a large and complex area which needs further consideration and probably its own policy.

Policy A3 Air Quality

2.c. development that involves substantial demolition, construction and/or earthworks;

2.d. any development that could have a significant impact on air quality, either directly or indirectly;

“Substantial” and “significant” need to be more clearly defined.

A.6. The requirement to demonstrate GLA standards will be met should apply to all applications, not just those required to submit an AQA.

13.80. How will conforming to the emission limit values for new plant in the Environment Agencies Medium Combustion Plant Directive be monitored? The same for sensitively positioned flues.

There is a lot of good intention and technical guidance in this policy, but a confusing number of different regulations to refer to and some lack of clarity on when they apply. Unless there is adequate monitoring capacity from the Council – in terms of technical competence and capacity, the aims are unlikely to be achieved. We couldn’t find reference to a relevant “team” (as for noise), it seems that there should be one for air quality, if there isn’t already.

Policy – Noise and Vibration

Building regulations also cover internal noise and so planning regulations apply where additional sound proofing is needed. Internal noise should be assessed at planning application all necessary assessment of internal and external noise should happen at planning process stage

A4 7. The Council will “seek to minimise” noise from deliveries and demolition/construction. This seems to be a watering down of the claim above that applicants have to demonstrate plant and machinery must be operated without causing harm to amenity.

Chapter 14 - Safe, Healthy and Sustainable Transport

Policy T1 Safe, Healthy and Sustainable Transport

This clearly incorporates the provision of equal treatment for persons with a relevant protected characteristic as defined by the Equality Act 2010, which is also included in Section 1, (Introduction) of the proposed new London Plan.

Policy 1a on page 68 of the Camden Transport Strategy states the following:

The Council will use a road user hierarchy to inform all relevant decisions: walking, cycling and public transport will be prioritised above private vehicle use as follows:

- Pedestrians
- Cyclists
- Public transport/vehicles for people with a disability
- Freight (including loading and unloading)
- Taxis
- Powered two-wheelers (motorcycles) and private cars

Policy T1 conflates walking, wheeling and cycling. We consider that a greater recognition of the differences within this broad category needs to be taken account of in the Local Plan. The differences are important because:

- With the greater availability and convenience of electrically powered cycles and other small battery powered wheeled vehicles, not all forms of “walking, wheeling and cycling” are active travel.
- Cycling, especially with battery assisted cycles can involve quite high speeds and in the design of buildings and public spaces needs to be considered carefully in relation to pedestrians. In general, cycles are expected to use the roadway, not the pavement, which should be reserved for pedestrians.

The term “wheeling” where used to mean the use of wheelchairs and other wheeled vehicles such as push chairs is a useful one, but is not always understood other than by planning and transport professionals.⁽²⁾ It can also cover pushing a cycle rather than riding it. In particular it is not widely understood whether scooters (battery powered or not) are included. It would be useful to include a definition and some more explanation on the use of the terms.

(8).See.for.an.explanation.of.terms;https://wheelsforwellbeing.org/uk-walking_wheeling_and_cycling_definitions-

It is essential that the Local Plan, addresses separately (i) walking and wheeling, and (ii) cycling. Walking and wheeling generally involves slow speeds and is quite different to cycling, which is at higher speeds and often involves quite heavy vehicles such as Lime bikes.⁽³⁾

(9).Lime.bikes.are.a.regular.source.of.resident.complaints?especially.when.ridden.and.left.on.pavements;

Insufficient attention to the differences in these modes of transport leads to a conflict with the second objective which “expect[s] development that involves changes to existing, or the provision of new streets, to implement the Mayor’s Healthy Streets approach, to ensure that streets are designed to be attractive, safe, inclusive and accessible for all, giving particular attention to the needs of older people, users with disabilities, neurodiverse people, women, girls and gender diverse people.”

14.4 The objective for 93% of journeys to be made by sustainable modes, may need to take account of a greater understanding of what constitutes a sustainable mode. We note also that there are variations of sustainability along a scale, and there is concern about whether battery powered vehicles are “sustainable”. Clearly, they are less sustainable than walking and unassisted cycling. It must also be remembered that many residential areas do not benefit from the availability of regular public transport services.

14.6 We note that incentivising active travel may sometimes be in conflict with many of the other objectives listed in this section, when cycling at higher speeds and / or battery assisted cycling is involved.

14.10 under Transport Assessments is an example of where it would be relevant to reword to take account of neighbouring boroughs where relevant, hence:

*“When determining applications for new development, the Council will consider the impacts of movements to, from and within a site, including links to existing transport networks, through transport assessments, travel plans, delivery and servicing management plans, and construction management plans, to manage and mitigate the impact of developments on Camden’s infrastructure, environment and communities, **whether in Camden or other nearby boroughs** and ensure that benefits are secured which meet the needs of Camden’s **and other nearby** communities.”*

Policy T2 Prioritizing Walking, Wheeling, and Cycling

Although details are given for improvements to cycle provision, there are none for the equal treatment of pedestrians, or for those who may suffer from disabilities recognized under the Equality Act 2010 as amended. Their needs may come into conflict with those of the cycling community. It is possible that the funds made available for cycle provision and encouragement will result in less government funding for provision of transport assistance to the elderly and disabled, including the availability of improved door-to-door public transport. It should be borne in mind that not everyone is able to ride a bicycle or walk long distances, whether for reasons of age or health, and their needs ought not to be lost sight of. Indeed, it may be argued that the needs of the elderly and disabled should be funded in priority to those of the cycling community, since pedestrians are first in the Council's hierarchy of road users.

It is also significant that The Mayor of London, in his proposed pedestrianization of Oxford Street, intends to limit cycling hours so as to protect pedestrians from interference.

14.18 As noted earlier it would be helpful to include an explanation about the meaning of “wheeling”.

T2 B. Agreed

T2 C. – There is increasing evidence of conflict between walking and cycling, for example disorderly cycle parking obstructing pavements, cycling on pavements and non-compliance with traffic signals by cyclists which then endangers pedestrians. The Local Plan cannot itself resolve all these issues but rewording is suggested as follows:

*C. To promote cycling in the borough and ensure a safe and accessible environment for cyclists **taking account of the needs of other users particularly pedestrians**, the Council will:*

*5. require development to be easy and safe to cycle through (permeable) and well connected to the wider cycle network, **while minimising conflict with and taking account of the priority given to walking in Camden’s Transport Strategy**;*

Policy T3 Public Transport

A & B. It is difficult to see how private development can be expected to meet the expense necessary to make all Camden rail and tube stations step-free. There will need to be some significant provision of funds from Transport for London and/or the rail network companies. Although it is stated that “The Council will ...promote step-free access and other station upgrades where possible and seek contributions from appropriate development schemes to deliver this” these good intentions do not inspire confidence that funds will in fact be available to fund the necessary work. If the interests of older and infirm passengers are to be protected

the Council must provide a reliable plan for the allocation of the funds to be raised.

Policy T4 Shared Transport infrastructure and services

By its nature travel and transport often involves travel across borough boundaries. It would be useful to add:

“The Council will work with other neighbouring boroughs to ensure interoperability of similar schemes in adjoining boroughs.”

14.32 & 14.33 Nothing is said about providing motorized transport, where necessary, for those with recognized disabilities, on a shared basis, as by a shared taxi service which some boroughs already operate, part funded by the individuals who use it if they can afford it. Such a service ought to form part of the shared transport plan and resources for implementing the Camden Local Plan are committed. Hospital pick-up and return delivery schemes by ambulance are at present seriously underfunded, and lengthy delays affect those requiring them.

There must be some joined-up thinking on financial provision for the necessary transport for the elderly and infirm both for medical journeys and for social visits and shopping which would involve contributions from the Council, the central government, and private developers. This is an area in which developers alone cannot be expected to meet the shortfall in government provision.

Policy T5 Parking and car-free development

A. Problems may arise where a new development is car-free, and accommodates no elderly or disabled residents at the outset, but as the original residents age or become infirm their needs change. It is also possible that elderly or disabled people might wish to purchase property in developments later on. Where is provision for their parking needs to come from unless allowance is made for this eventuality at the outset? Unless some advance provision is made for such needs the rights of those with protected characteristics under the Equality Act will be compromised. Suggested rewording:

The Council will limit the availability of parking and require all in new developments in the borough generally requiring them to be car-free to reduce car ownership and vehicle use and encourage the use of alternative, sustainable modes of travel. Provision of parking will be considered in the context of the PTAL rating of the location and availability and suitability of other alternative modes of travel.

A5. the Council will “support redevelopment of existing areas of car parking (including garages) for alternative uses” may make it difficult or impossible for persons with protected characteristics under the Equality Act to find parking where necessary. Once the garages and parking lots are redeveloped for other uses the spaces for those in need will disappear.

A7. It is not clear what the objectives involved within a “parking management plan” would be.

A9. It is not clear how this can be achieved or is relevant. It may need to be reworded as follows:

The Council will seek contributions towards the review of Controlled Parking Zones (CPZs) where a development is shown expected to contribute to an increase in on-street parking in a local area during the construction phase or permanently. Where a development may or have an unacceptable impact on highway safety, arrangements for parking in the vicinity may need to be reviewed.

14.45 the statement:

“All new residential developments in the borough, including schemes where homes are created through a change of use, should be car-free.”

This should be replaced with:

“New residential developments in the borough, including schemes where homes are created through a change of use, should generally be car-free.”

14.48. the Council »will only consider the retention or re-provision of existing parking provision where it can be demonstrated to its satisfaction that the existing occupiers are to return to the address when the development is completed«

How is this to be demonstrated? What are the criteria to be applied? Present needs may not be the same as future needs, not all of which will be foreseeable.

It is generally recognized that the population of Camden is ageing; within Camden there is a variation in ageing profiles between the north of the borough, which includes Highgate and the south; the north has a higher proportion of elderly residents. Will Camden recognize this distinction in applying its parking policies?

Unless care is taken the application of these blanket provisions will prejudice the right of many in North Camden to find necessary parking places. Land is very limited in the borough and once parking space is redeveloped for new uses it will be almost impossible to replace it.

It must also be borne in mind that the reality is that Highgate, which has a high proportion of elderly residents, is also one of the most hilly parts of London, and not all areas are linked by public transport. For these people, and others with limited mobility, the use of cars is often essential to allow any quality of life. These aspects must be taken into consideration when issuing proposals which will limit parking and car usage.

Policy T6 Sustainable movement of goods, services and materials

Many services do not require any physical movement, and are typically delivered through electronic means. Only some services require to be provided by in person travelling to a location.

Movement of Goods and Materials involve businesses undertaking potentially complex assessments of the cost and economic efficiency of alternatives. Camden should seek to encourage the use of bicycle/cargo bikes, light electric vehicles, canal, and rail through the use of charges and prices to incentivise the adoption of desired behaviours and modes of transport, and should also encourage TfL to adopt such approaches, including potentially road user charges for vehicles. There will be locations within the borough where the use of cargo bikes is viable and will not increase the costs for a business. In other cases, for example with heavier products and materials, this will not be the case. Care must be taken not to micro-manage this complex topic, which is better dealt with through prices and charges that businesses can take account of in their logistics planning and hence nudge the desired outcomes.

Those with protected characteristics under the Equality Act will have requirements for goods and services to be delivered to their homes, and not to a central hub for collection. It may be possible for last mile deliveries to be carried out by sustainable means, but adequate arrangements will be required to be made in advance of any general modification or reduction in the use of delivery vans in favour of more sustainable transport.

Responder 649

Dear Camden Planning Policy Team

Transport part of the Camden Infrastructure Delivery Plan (CIDP) dated April 2025, the Transport Delivery Plan (TDP) and its Appendix B1

The draft Infrastructure Delivery Plan has been published for comment alongside the Camden Local Plan Proposed Submission Draft. This

letter addresses our comments on the CIDP. The CIDP is itself a draft and comments are invited.

The implications of the Dartmouth Park Healthy Neighbourhood (DPHN) plan being reconsidered and "sent back to the drawing board" do not

appear to have been fully taken account of in this April 2025 edition of the CIDP. On page 149, the DPHN plan is described as follows:

"Dartmouth Park Healthy Neighbourhood Scheme: a variety of traffic reduction, public realm, road safety, pedestrian and cycling, urban

greening and Healthy Streets measures across the Dartmouth Park area. A joint scheme with Islington Council (currently subject to further

review)." The outcome of this further review is not yet known.

At page 149 of the CIDP there is a map of the cycling routes. This appears more fully at TDP App B1 paras [2.3] onwards. Highgate Road and Swains Lane

are shown as cycling routes for 'consultation/engagement during 2025/6'. So far there has not been any 'consultation/engagement' yet, except in relation to the

DPHN. The following concerns about this cycle route proposal arise:

A: Swain's Lane is proposed to be two-way for cycles north of the Cemetery entrance TDP B1 [2.41]. This proposal appears to be made without reference to

a plan to close the upper part of Swain's Lane to other traffic. It will be dangerous if cars and other traffic are travelling up the hill, as they do at present.

B. If Swain's Lane is closed as was proposed in the DPHN north of the Cemetery entrance to traffic (except for cycles) then the danger would go, but then all

the traffic to the Cemetery, including coaches, would need to turn round somehow to return down Swains Lane.

As a general consideration, in order to be useful cycle routes need to continue across borough boundaries in order to cover the routes that cyclist actually wish

to travel. This consideration is especially important for any cycle routes in Highgate which is a cross borough community that sits astride Camden, Haringey

and Islington boundaries.

The cycle route up Dartmouth Park Hill comes to an end at Highgate Hill. There is no proposal for a cycle route up Highgate Hill and Highgate High Street or

Hornsey Lane. (The DPHN proposals included a bus lane on Highgate Hill north of the junction with Dartmouth Park Hill, but did not include a cycle lane.)

The northern section of Dartmouth Park Hill, north of the Whittington Hospital, is narrow and it would not be possible to instal a cycle lane while retaining

two way traffic. There are no proposals for one way traffic in this section of road and so we think a cycle lane is not feasible there. (We note that even within

the DPHN proposals there were no proposals for Dartmouth Park Hill to be made one way.)

A primary cycle route is shown on Spaniards Road B519, but there is no plan shown for extending this along Hampstead Lane or southwest into other parts of

Camden. There is also no plan shown for Hornsey Lane. These routes would fall within the responsibility of Haringey and Islington respectively. It is

understood that Camden cannot speak for these other boroughs, however, for a coherent area wide set of cycle routes to emerge greater recognition of the cross

boundary issues is needed. For this reason on page 149, we suggest an additional bullet point under the heading "Healthy Routes (cycling) – strategic

cycling corridors and Cycleways” to say: “Where cycle routes and cycleways connect cycle journeys to or from other boroughs, Camden will prioritise

working with relevant neighbouring boroughs so that a coherent area wide route network is created."

At page 150 under "Healthy School Streets" the documents includes "Measures to improve road safety and enable walking, cycling, wheeling and

public transport to and from schools with “timed” access restrictions outside schools in feasible locations". This should apply to the entrance to

Channing Junior School on Highgate Hill, a borough boundary road with Haringey. In order to make clear that the commitment is understood to apply to

schools in boundary roads, we request a revision to the wording as follows: "Measures to improve road safety and enable walking, cycling, wheeling

and public transport to and from schools **including those on borough boundary roads** with “timed” access restrictions outside schools in

feasible locations, ”.

Page 153 to 155 cover topics related to Underground and other rail travel. However, there is no reference to the atrocious air quality on the Underground - the

single most harmful public health problem which is almost universally ignored. The two most polluted underground lines in the world run through Camden -

the Victoria and Northern lines, with between 15 and 30 times the surface level air pollution on their platforms. This merits a headline in the Plan. There is

also nothing about healthy underground travel under healthy travel initiatives in TDP and its Appendix B1. Although the TDP is linked with Camden's Clean

Air Action Plan [2.8] - which also ignores pollution on the Underground.

At [2.3] of the TDP a selection of the projects due to be included in the next 3-year plan include 'the emerging scheme in the Dartmouth Park Area', including

a link to the old scheme and its consultation (closed of course). This is out of date and should be corrected and now described as "a possible scheme".

At [2.11] of the TDP it states 'Healthy Streets projects deliver excellent value for money' but doesn't specify how, although states that the one in Chalk

Farm Road had a 6:1 BCR. However, we note that this outcome may be specific to that scheme. For example the West End Project Final monitoring report in

its conclusions states at 16.31 on page 98: "Monitoring of Mastercard Spend and Transaction Counts data demonstrates that spending on Tottenham Court

Road has not returned to normal (pre-COVID) activity levels and that spending recovery in the WEP scheme lags behind that observed in the West End [i.e.

the wider area outside Camden] in all categories monitored and on all days of the week." In other words for the Camden West End Project, there was a

reduction of customer spending relative to other West End areas. The first sentence is a generalisation that is not always true and we suggest a revision as

follows: "Healthy Streets projects **can depending on the circumstances** deliver excellent value for money **for local businesses.**"

William Brittain

Highgate Society

Date: Fri, 27 Jun 2025 16:05:38 +0000
From: Gail Waldman
To: PlanningPolicy
Subject: Camden's Draft Local Plan June 2025

Thank you for inviting comments on your Draft Local Plan.

These are attached for your consideration.

Kind regards,

Gail Waldman



We appreciate being consulted on Camden's Draft Local Plan and submit our comments here for your consideration.

Chapter 2: Development Strategy

2.7 The Council proposes to meet its housing requirement through existing permissions for committed schemes, site allocations and windfall development (proposals that come forward on sites that have not been allocated for development). To this end, the Plan makes a number of site allocations to deliver the additional houses required over the plan period and these are set out in the area chapters for South, Central, West and North Camden.

Highgate Conservation Area Advisory Committee comments: we are concerned in terms of suitability and deliverability that the largest proportion of new homes would be provided in tall buildings.

Chapter 3: South Camden: Highgate Conservation Area Advisory Committee has no comments on this section.

Chapter 4: Central Camden: Highgate Conservation Area Advisory Committee again comments: we are concerned in terms of suitability and deliverability that the largest proportion of new homes would be provided in tall buildings. Our concern is two-fold: the suitability of the form of housing for families especially large families which is the largest group on your waiting list; and the impact both on local town centres and on key vistas. We will scrutinise any applications coming forward very carefully. Taken together the impact of these developments, should they go forward, would have a great impact on a number of Conservation Areas in Camden. Chapter 4 - Central Camden; and Chapter 12 - Design and Heritage, 12.8 Tall Buildings; pp 453 - 458.

Highgate CAAC challenges 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)

HCAAC whole-heartedly supports the request submitted to this Consultation by Waterlow Park Trust Advisory Group for a new Protected View of St. Paul's from Waterlow Park to be included in Camden's forthcoming Local Plan.

Views from Parliament Hill and Kenwood House on Hampstead Heath are protected in law. However, the view protected cannot be 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 Vistas

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

Reference Views:

1 Alexandra Palace to Central London

2 Parliament Hill to Central London

3 Kenwood to Central London

4 Primrose Hill to Central London

5 Greenwich Park to Central London

6 Blackheath Point to Central London

HCAAC submits that 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

Highgate CAAC challenges the assertion that the above sites are “**Locations where tall buildings may be an appropriate form of development**”:

Chapter 4 - Central Camden; and

Chapter 12 - Design and Heritage, 12.8 Tall Buildings; pp 453 - 458.

(see also **Figure 22 Tall Buildings on p 456**)

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).

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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.

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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.

As we have stated above, 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

Ref View

- 1 Alexandra Palace to Central London**
- 2 Parliament Hill to Central London**
- 3 Kenwood to Central London**
- 4 Primrose Hill to Central London**
- 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).

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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

Chapter 5: West Camden: Highgate Conservation Area Advisory Committee has no comments on this section.

Chapter 6: North Camden: Highgate Conservation Area Advisory Committee has no comments on the Site allocations except that the loss of key worker accommodation (Hampstead) seems very unwise and potentially unsupported by Camden’s housing higher level strategies. The net loss of housing units on the Hampstead site will need to be added to the housing list as Camden presumably must maintain key worker accommodation provision.

We will deal with other aspects under the chapter headings which follow.

Chapter 7: Meeting Housing Needs: Highgate Conservation Area Advisory Committee entirely supports the policies as set out but policy on student housing

“7.50 In accordance with criterion (iii), we will not seek a housing contribution from development of non-residential floorspace secured for occupation by a Higher Education institution which is supported by the Office for Students, and thereby serves a public purpose. In addition, where development is proposed by a Higher Education institution supported by the Office for Students, as an alternative to seeking self-contained housing, the Council may support a mixed-use development including student housing that serves the same institution, subject to the student housing satisfying the requirements of Policy H9.”

Outside The Knowledge Quarter, these are the proposed numbers:

Kentish Town Fire Station: 30

100, 100a and 100b Chalk Farm Road: number not provided

109 Camden Road: Existing: 714. Proposed: 180 = net loss

W8 Finchley Road: 60

There does not appear to be an overall justification for any of this provision.

Chapter 8: Responding to Climate Change: Highgate Conservation Area Advisory Committee supports Camden’s proposals and note:

“iv. Require proposals that include the addition or replacement of 500sqm floorspace or more; or developments providing one or more additional dwellings through conversion and / or additional floorspace to:

- a. reduce the amount of energy required to heat the building/s over a year, as far as possible, to meet a space heating demand of 50 kwh/m2/ year. Proposals within a conservation area or related to a listed building may be provided an additional allowance of 10 - 20 kWh/m2 where it is demonstrated to the Council’s satisfaction that the above target of 50 kwh/ m2/year cannot be met;”.

However, what is not clear is whether this policy would achieve the NPPF and London Plan requirements as the numbers of applications is unknown.

We support CC10: Sustainable Design and Construction Certification.

With regards to CC11: Flood risk we strongly suggest Camden requires a second opinion at the Applicant’s expense on Hydrogeology in connection with any applications which include basements.

Chapter 9: Delivering an inclusive economy: Highgate Conservation Area Advisory Committee comments as follows:

[REDACTED]

Ground floor uses 9.91 Key to the vitality and viability of centres is retaining a cohesive mix of uses at ground floor level. Where frontages become broken, it can impact on the appeal

of a centre. While the Local Plan supports additional housing in centres, where shops, food and drink or other local services are converted to homes they are likely to stay in residential use permanently meaning their potential benefit for commercial or community functions is lost. Not really applicable in our area but you never know.....

Chapter 10: Supporting Camden's Communities: Highgate Conservation Area Advisory Committee comments as follows:

We support: Policy SC1 and in particular

- Promoting healthy lifestyles, increased physical activity and improved mental health through the design of new development (Policies DS1, SC1 and D1), the protection of existing and provision of new and enhanced open space, play and sports facilities (Policies SC2 and SC3) and investment in active travel (Policies T1 and T2). Please see our comments under Chapter 11.

Chapter 11: The Natural Environment: Highgate Conservation Area Advisory Committee comments as follows:

Policy NE1 – The Natural Environment

A. The Council will conserve and enhance Camden's natural environment. The Council will:

- i. Protect and enhance the network of open spaces and local green spaces across the borough in accordance with Policy SC3 Open Space;
- ii. Give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);
- iii. Designate and protect nature conservation sites (including the Ancient Woodland on Hampstead Heath) and other features of biodiversity value, such as Sites of Importance for Nature Conservation, corridors and stepping-stones in accordance with NE2 Biodiversity;
- iv. Support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;
- v. Protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;
- vi. Preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath;

- vii. Work with partners to preserve and enhance the Regent's Canal, including its setting, and balance the differing demands on the Canal and its towpath;
- viii. Require all development to enhance biodiversity in line with Policy NE2 Biodiversity;
- ix. Protect trees in Camden and seek to secure additional trees in accordance with Policy
- x. Secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;
- xi. Encourage the delivery of highways greening measures in accordance with Policy T1 Safe, Healthy and Sustainable Transport;
- xii. Require multi-functional Sustainable Urban Drainage Systems (SuDs) to be provided in accordance with Policy CC12 Sustainable Drainage;
- xiii. Seek to improve opportunities for residents and the public to access and engage with nature, particularly in areas where such opportunities are lacking; and
- xiv. Seek contributions from development to the delivery of the priorities and projects set out in the Local Nature Recovery Strategy, Camden Biodiversity Strategy and Camden Green Infrastructure Strategy.

Policy NE3 – Tree Planting and Protection

A. The Council will seek to protect existing trees and secure additional tree planting in the borough. The Council will:

- i. resist the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. The Council will also resist proposals which may threaten the continued wellbeing of such trees as specified above;
- ii. make Tree Preservation Orders (TPO's) when necessary to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity;
- iii. ensure that where trees are to be retained on developments, these are positively integrated into the design and layout of the proposed scheme;
- iv. require trees and vegetation, that are to be retained, to be satisfactorily protected both during and following the demolition and construction phase of development, in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction';
- v. require replacement trees and/or vegetation to be provided where the loss or harm to the wellbeing of significant trees and/or vegetation has been justified in the context of the proposed development;

- vi. prioritise securing replacement trees and vegetation on-site. Where it can be demonstrated to the Council's satisfaction that replacement trees and vegetation cannot be provided on-site, a financial contribution will be secured to enable the planting and subsequent maintenance of replacement trees and vegetation off-site;
- vii. require developments to incorporate additional trees and vegetation wherever possible, as part of a detailed landscaping scheme for the site. A detailed landscaping scheme and landscape management plan must be submitted for all major developments, including, but not limited to, details of the trees and vegetation to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development. Tree protection

Policy NE3 is supported by HCAAC.

While there are many positive aspects of the draft Camden Local Plan on the Natural Environment, the adverse effects on climate change, demolition of existing large buildings with the embodied carbon and loss of trees and open space needs to be very carefully balanced in policy and then monitored and recorded. Loss of light, amenity, green and neighbourhood open space as a result of recent major permissions has been very marked.

Hampstead Heath accounts for a very large percentage of Camden's open space. This makes plain the significant paucity of open space in other parts of the borough which are not on the doorstep of Hampstead Heath. Rebalancing provision should therefore be a priority for this Plan.

Green spaces are a limited resource which can easily become exhausted. Cramming ever more attractions and activities into spaces for nature is not the answer for those seeking a reprieve from the hustle and bustle of city life. Green spaces are highly valued for their calming quality and places to experience nature without overcrowding them. A growing population and protecting nature must together be taken forward by Camden without conflict between the two essential ingredients of a Local Plan.

Communities can help shape better designs and environmentally friendly schemes which respect the nature, character, communities and heritage of Camden. Fostering nature in an ever higher density developments must not be a contradiction.

If Chapter 11 is to become meaningful in practice then Camden needs to talk to government about the destructive effects of its weakening protections for biodiversity and habitats, and its weakening of goals and efforts to counter climate change and carbon emissions.

With regard to mature trees, Camden's street trees also need greater protection as well as those in gardens and parks. We are pleased to see that has been covered by propose policy.

Root protection areas of neighbours' and street trees and large shrubs must be shown on applicant's drawings and should be protected in Decisions and/or Conditions.

Policy NE4 - Water Quality A. The Council will seek to ensure that development avoids the pollution of groundwater sources to protect the water environment and public health. The Council will:

- i. **Require a Preliminary Risk Assessment to be submitted where land is potentially contaminated. Where development poses a risk to groundwater within the borough's Source Protection Zones, to submit a Hydrogeological Risk Assessment. If the Hydrogeological Risk Assessment identifies unacceptable risk, then the applicant will be required to provide appropriate mitigation. Any mitigation proposed must be agreed by the Council and Environment Agency in writing prior to implementation.**
- ii. **Require applicants to undertake a Foundation Works Risk Assessment (FWRA) where piled foundation works are proposed within a Source Protection Zone, or where piled foundations extend through the London Clay to more sensitive aquifers, to ensure that the risks to groundwater are minimised.**
- iii. **Require development within the borough's Secondary A aquifers to protect groundwater from pollution.** iv. **Expect developers to prevent discharges to ground through land affected by contamination.**

This approach is welcomed.

Chapter 12: Design and Heritage: Highgate Conservation Area Advisory Committee comments as follows:

Policy D1 – Achieving Design Excellence

xii. carefully integrates building services equipment, minimising visual clutter and ensuring there is no harm to the wider townscape and the amenity of neighbouring occupiers;

This policy is becoming more crucial especially given the required reduction in carbon emissions elsewhere in the document. So the wording provides both applicants and planners little guidance on how to interpret and enforce this clause.

We welcome this and several other policies which refer to the impact of views of proposed tall buildings, defined as over 30m outside the CAZ:

Policy D2 Tall Buildings:

viii. the relationship between the building and hills and views, ensuring that any proposal responds to local views and preserves protected views;

Policy D3: Design of Housing

Design is not actually mentioned but depends on Planning Guidance. This is too open-ended

Private amenity space

12.48 Private amenity space: requires “residential amenity of neighbours [to be] preserved”.

12.52 It is however important that extensions and alterations are undertaken in a sympathetic way, to achieve a high quality, sustainable development that responds to and respects the existing building and surrounding townscape (particularly in relation to heritage assets) and does not harm the amenity of neighbours.

This must be thoroughly embedded in policy, especially given the high levels of development anticipated in this Local Plan. In a street location where the boundary is not straight there can be confusion between what could be either a side or rear extension. We suggest clear guidance on this is required such as:

- From a position on the centre line of the boundary and at right angles to the boundary, could the proposed extension be seen? if not then the proposal would be a rear extension. There may be other situations when similar clarity is required

HCAAC welcomes these policies:

C. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

D. The Council will resist any cumulative, incremental, changes to a designated heritage asset, where there is concern that the changes may impact on the significance of the designated heritage asset or may cause harm to the character or appearance of the conservation area.

We suggest some caution about the proposed wording of this clause and in particular HCAAC considers it would cause confusion to inaccurately paraphrase the NPPF which is, in any case, subject to change. Given the expected level of development we are very uneasy to the point of objecting to most of this section including:

Sustainability Improvements to Designated Heritage Assets

E. The Council will support proposals to adapt and improve listed buildings, and buildings within conservation areas, to reduce energy demand, mitigate the impacts of climate change and ensure they are adaptable to a changing climate provided they do not cause significant harm to the special historic or architectural interest of the heritage asset. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will weigh that harm against the public benefits of the proposal, giving significant weight to measures that respond to the climate emergency in a sensitive manner.

HCAAC considers the highlighted sections are unacceptable.

Conservation Areas

F. Conservation areas are designated heritage assets, and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

G. The Council will:

i. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

However HCAAC is pleased to see the retention of the following clauses;

ii. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;

iii. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and iv. preserve trees and garden spaces which contribute to the character and appearance of a conservation area, or which provide a setting for Camden’s architectural heritage.

HCAAC considers it is very important that applications for sustainability improvements in Conservation Areas and to all heritage assets must be accompanied with as existing and as proposed details of windows, doors, eaves, ridges, chimneys, etc. at 1:5 scale in addition to the requirements proposed:

Details

12.75 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration.

Non designated heritage assets:

HCAAC considers there is some confusion and possible duplication between Camden’s Local List and the street by street summary of character which are also a very useful documents

Chapter 13: Protecting amenity

Not yet done

Chapter 14: Safe, healthy and sustainable transport: Highgate Conservation Area
Advisory Committee comments as follows:

The C11 bus route must be retained where it passes through the Dartmouth Park area.

The 214 bus is regularly prevented from reaching its destination in Highgate Village because of the 'school run' to and from the many schools, nurseries, etc. in Highgate. Just as it is proposed that the Redington Road and Frogna Conservation Area should not allow any more school development, we urge that a similar policy should apply in the Highgate and Dartmouth Park Area. It is intolerable that elderly or disabled people and people pushing wheelchairs are 'thrown off the bus' at the bottom of Highgate West Hill when Highgate Village is congested by the 'School Run'.

Supposedly the Highline in Camden Town would revert to a railway line in 20 to 30 years' time so a budget for the future changeover needs to be secured.

Date: Fri, 27 Jun 2025 17:07:33 +0100

From: Chris Buck

To: [redacted]

Subject: Comment in Support of Traveller Pitch on Adelaide Road

Diversity is one of Camden's strengths, which is why I am writing to express my support for the Council's plan to create a pitch for Traveller families on Adelaide Road, which is not too far from my family's [redacted]

My experience is that Traveller families are very discreet neighbours. I take my child along [redacted] every Friday evening for swim lessons, and it wasn't until I read the Site Identification Study that I realised we walk right past a Traveller's site during our commute.

I live around the corner from the former depot off [redacted] and if that site was not excluded from further consideration I would be in favour of building pitches there as well (I have expressed my support for the proposed student housing project, but would prefer Travellers as neighbours because they are more family oriented than students.)

Thank you for considering these comments in the decision-making process,

Chris Buck

[redacted address]

[redacted] [redacted postcode]

To: Camden Council Planning Department
From: Graham Maclay
Date: 27.06.2025

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

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.

I have just become aware of this proposal so have only included some brief summary points of my objection in order to meet the 5pm deadline to submit a representation.

Having [REDACTED] I am very familiar with the site and have come to greatly appreciate the benefits that this space brings to the local community. I believe the proposed designation would:

- Lose a valued community space
- Sacrifice rare green space including a number of mature trees and the Communi-Trees project
- Lose a well-used outdoor area that serves a recreation, relaxation space for the large number of flats in the surrounding areas who don't have access to gardens
- Further add to an already densely populated corner of Camden that is extremely busy and noisy from a high volume of cars, buses, ambulances, Chalk Farm tube station, Haverstock School, Camden and the Roundhouse nightlife as well as ongoing HS2 works

I therefore implore you to reconsider this designation. Instead, I would propose that the area is preserved and even improved by creating a proper park and playground for locals, including those in Constable House, Adelaide Road and Eton College Road to use.

Should it be necessary, I would like the opportunity to participate at any examination hearings in order to ensure that the views of local people are represented.

Thank you for your consideration of this objection.

Yours sincerely,

Graham Maclay

[REDACTED]

Date: Fri, 27 Jun 2025 17:36:16 +0100

From: Julia Littleboy

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

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

My name is Julia Katherine Littleboy and I am writing to you regarding the proposal to situate the proposed Gypsy and Traveller site at the site listed in the subject header to request the deletion of the site from the planning proposal. I am a [redacted]
[redacted]

The proposal for Gypsy and Traveller accommodation is, as you are aware, outlined within the Camden Local Plan Proposed Submission Draft (Regulation 19). I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) - minimum access width standards; - PPTS Paragraph 13(b) - sites must be accessible and deliverable; -

Equality Act 2010 - provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

Many thanks for your consideration; it's much appreciated.

Warm regards,

Julia Littleboy

Date: Fri, 27 Jun 2025 16:48:59 +0000
From: LESLEY STEWART
Subject: Camden Recycling / Regis Road / Holmes Road

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

Hello,

I understand there are plans to move the recycling centre currently in Regis Road to a new location in Holmes Road.

As a fairly regular user of the centre in Regis Road, I feel compelled to write in protest in support of my neighbours (down the road), [redacted] I live in the [redacted] of NW5 and use the Regis Road recycling centre often. It is always busy, with a variety of users, often transit vans crammed full of builders rubble and other unknown materials from what must be building sites (possibly single home?). Despite the centre not being one for industrial waste, I have regularly noticed what could be termed as such.

Regis Road is currently non residential and therefore best suited for such a centre for rubbish distribution as it currently has a lesser impact on Camden residents and school goers.

The new proposed site has people living in what would be close proximity, along with young school goers and their teachers. Apart from a hideous increase in traffic pollution in Holmes Road, there would almost certainly be a decrease in the cleanliness of the atmosphere from the variety of rubbish dumped at the centre. This directly affecting the residents/young school goers, their teachers/and other local workers.

I understand that the current Regis Road site is to be developed in the near future. Surely it makes more sense to keep the recycling centre in its current position, but to upgrade it to offer protection to any new development there. It should be included in any redevelopment plans currently being discussed to ensure it remains in Regis Road. Build around and accommodate it.

The existing residents of Holmes Road, along with the young school students and their teachers, and other existing people working there need to be protected from this plan. They are as important as any potential residents etc. of any new development in Regis Road.

Please keep the recycling centre in Regis Road. Upgrade it and keep it there.

Yours, Lesley Stewart

Date: Fri, 27 Jun 2025 14:54:51 +0000

From: [redacted]

Subject: Camden Local Plan - Site C27

I wish to make a submission concerning the proposal for the above site contained in the current draft of the Camden Local Plan and register my **strong objection** to allocation of the site for Gypsy and Traveller Accommodation since it is **wholly unfit for purpose**.

[redacted] [redacted postcode] in one of the 365 flats that comprise the [redacted] and lie adjacent to the site in question. I am therefore familiar with the location and benefit from the small area of green/open space that it provides for residents of this densely inhabited area. Apart from the flats in the three [redacted] the site is also bordered by [redacted] and the [redacted]. In addition to these, a 7-storey block of flats is currently under construction at 5-[redacted address] that will further intensify the building mass and population of the immediate area.

Re-purposing the site for Gypsy and Traveller Accommodation will destroy the relief that it offers for residents of all these multi-storey dwellings, put further pressure on local infrastructure and services, and involve removal of the trees that currently sit at the centre of the site, providing shelter from sunlight, reduction of heat from tall and airless built structures, and relief from traffic pollution. The area has recently lost numerous trees to the HS2 Development further along Adelaide Road. To cut down those in the sole small area of greenery that remains will condemn the neighbourhood to unmitigated urban blight.

The site in question is far too small to provide satisfactory accommodation for Gypsy or Traveller homes, and is also unsuitable in terms of vehicular access, which would have to be from either Eton College Road - which is too narrow and constricted - or Adelaide Road - which is too busy.

I therefore believe that it fails to conform with several criteria of National Planning Policy if the status of the site is changed from its current usage (as an outdoor space for the residents of Constable House), and it is reallocated as a location for Gypsy and Traveller Accommodation. I would therefore urge Camden Council to remove it from the Draft Local Plan and look for a site that is better suited and more appropriate for Gypsy and Traveller accommodation elsewhere in the borough.

Yours sincerely
Colin Ludlow

[redacted]

Date: Fri, 27 Jun 2025 18:04:03 +0100
From: Anita Engler
To: [redacted]
Subject: Re: FW: URGENT, closes 27th June Proposed Gypsy and Traveller Site next to Constable House on Eton College Road [ACTION REQUIRED]

I do not agree to site being used for gypsy encampment it is certainly not the right place to house families there also I have only just found out about Camden's proposal it's a very deceitful way of proposing this without any consultation

----- Forwarded message -----

From: <[\[redacted email\]](#)>
Date: Tue, 24 Jun 2025 at 17:53
Subject: FW: URGENT, closes 27th June Proposed Gypsy and Traveller Site next to Constable House on Eton College Road [ACTION REQUIRED]
To: <[\[redacted email\]](#)>, <[\[redacted email\]](#)>, <[\[redacted email\]](#)>, <[\[redacted email\]](#)> <[\[redacted email\]](#)>

FYI

From: diana milner <[\[redacted email\]](#)>
Sent: 24 June 2025 17:21
To: PamWHITE <[\[redacted email\]](#)>
Cc: [\[redacted email\]](#); [\[redacted email\]](#)
Subject: URGENT, closes 27th June Proposed Gypsy and Traveller Site next to Constable House on Eton College Road [ACTION REQUIRED]

Dear all,

we have an urgent matter for your attention: you might have already heard about Camden's proposals to locate a Gypsy and Traveller Site in the space next to Constable House at the bottom of Eton College Road (pretty much directly opposite the entrance to Eton Place). Links to all of the plans and the background are included below.

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

- It is in an already crowded area next to Constable House and Eton Villas, and would be overlooked by buildings of more than [redacted address] and the new development next to Chalk Farm tube station.
- It is very small (and actually smaller than the minimum size that Camden themselves recommend).
- It is next to a main road, a railway and an ambulance run - making it an unpleasant location for new dwellings.
- It will be highly impacted by the HS2 works for the next decade and add extra traffic to the area during the works for this.
- It's an area of high footfall; everyone walking from Chalk Farm station to Primrose Hill across the bridge will walk past it, and it will be highly visible and lack privacy.
- It will mean loss of green space and a playground for the residents of Constable House who seem to know nothing about the plan.
- It will have a knock-on impact to the local community and Primrose Hill, including the policing of these areas.
- The Traveller community don't like it and fear losing their current accommodations as a result (<https://www.camdencitizen.co.uk/2025/04/17/camden-travellers-anxious-plans-long-awaited-sites>)

Representations can be submitted by email to [\[redacted email\]](#), and must arrive before 5pm next Friday 27th June. NERA will submit a representation on behalf of the leaseholders that it represents, and we are working with Parkgate Aspen and the company responsible for the new development next to Chalk Farm tube to encourage them to submit their own representations. Camden have indicated that groups who share a common view should submit a single representation, but experience tells us that the absolute volume of representations received is very much material in swaying the council's thinking.

Attached to this message, you will find an example representation produced by a neighbouring residents association who have direct experience of the planning process. If you feel motivated to make a representation, you can use this as a template.

Below you will find links to the relevant background information, as well as another example of a representation, this time courtesy of the Adelaide Road Tenants Association.

- The draft Camden Local Plan (see references to site C27 in Chapter 4, Chapter 7 and the Map): <https://www.camden.gov.uk/draft-new-local-plan>

- April 2025 Topic Paper (see para 4.7 to 4.12): <https://www.camden.gov.uk/documents/d/guest/camden-local-plan-proposed-submission-draft-site-selection-topic-paper-april-25>

- Borough of Camden Gypsy and Traveller Site Identification Study (see various references throughout to Land East of Constable House - site 1016 in maps): <https://drive.google.com/file/d/1Y9YFsB3D2UGbjkh0qr9QjSQnER1Q-tvQ/view>

- May 2025 Report:

<https://democracy.camden.gov.uk/documents/s124628/8+Camden+Local+Plan+Proposed+Submission+Draft+Cabinet+Report.pdf>

- ...and related documents: <https://opencouncil.network/meetings/61279>

- Selected extracts from the Camden Submission Draft Local Plan 2025: https://docs.google.com/document/d/1Qp-Di2o_lvLGiiXyOatA6jEASP1qLCpz

- Example representation from the Adelaide Road Tenants Association (ARTA):

<https://docs.google.com/document/d/1amhNlueyAUqd0wXcOXdilLvl2qi5CS2a>

Last point: to allow some of our Provost Road neighbours to participate in the discussion, this matter will be the first agenda item at the AGM on Monday. An incentive to arrive promptly...

All the best,

Date: Fri, 27 Jun 2025 17:49:11 +0000
From: HNL Sustainable Places
To: planningpolicy@camden.gov.uk
Subject: Environment Agency Representation - Camden Local Plan

This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Planning Policy Team
Camden Council

Date: 27 June 2025

5 Pancras Sq,
London N1C 4AG

Email: planningpolicy@camden.gov.uk

Camden Local Plan – Proposed Submission Draft – Regulation 19

Thank you for consulting us on the above proposed submission draft for the new Camden Local Plan.

Having reviewed the submitted information, we have the following comments to make on environmental considerations within our statutory remit. The comments are divided into:

- Local plan policies and content
- Evidence base
- Site allocations

We believe that the draft local plan is sound in terms of environmental considerations within our remit. We would like to share the

Local Plan policies and content
--

Policy CC1: Responding to climate change

We welcome the additional policy clauses around retrofitting to support better energy efficiency of existing buildings.

Policy CC3: Circular economy and reduction of waste

We are pleased to see the inclusion of clause b(4) around on-site sorting and re-use of materials. We also welcome the inclusion of Figure 19 that outlines the waste hierarchy established in the North London Waste Plan.

As recommended in our Regulation 18 response, we believe that all development (not just major development) should demonstrate the facilitation of the movement of waste up the hierarchy.

Policy CC6: Energy reduction in new buildings

In the supporting text for this policy, we would recommend that a paragraph be added acknowledging that increased water efficiency can reduce requirements.

Policy CC8: Overheating and cooling

We support this policy and recommend that reference is made to [The London Climate Resilience Review 2024](#), which identifies heat risk as one of the principal climate risk for London.



Policy CC9: Water efficiency

While we trust that this policy is sound and welcome the requirement for residential development to achieve a water efficiency of 110 litres of water per head per day; we would request the council to consider recommendations from our Regulation 18 response (dated: 13 March 2024), which we believe can make the policy more robust and effective.

Policy CC10: Flood Risk

We are supportive of this policy and have no further comments since our Regulation 18 response.

Policy CC11: Sustainable drainage

We welcome the amended policy wording under clause C of this policy.

We are pleased to see the inclusion of SuDS guidance in paragraph 8.157 and would like to re-share the following resources that can be extremely beneficial while designing efficient SuDS:

- [The Environment Agency's Approach to Groundwater Protection](#), particularly statements G1 and G9 to G13
- The [CIRIA C753](#) SuDS Manual

Policy NE1: The Natural Environment

We have no further comments to add to this policy.

Policy NE2: Biodiversity

We are supportive of this policy and request the council to consider recommendations shared in our Regulation 18 response (dated: 13 March 2024).

Policy NE4: Water Quality

We are pleased to see the inclusion of the Thames River Basin Management Plan and the Water Framework Directive in the supporting text for this policy.

Policy T1: Safe, Healthy and Sustainable Transport

We welcome the inclusion of wording around SuDS in clause 3 of the policy.

Evidence base

We have no further comments to add in relation to the evidence base submitted as part of the draft local plan since our Regulation 18 response (dated: 13 March 2024).

Site allocations

Please refer to our Regulation 18 response (dated: 13 March 2024) for extensive comments on site allocations in terms of environmental constraints within our remit. These were attached as Appendix one to the said response



Final comments

Thank you again for seeking our representation on the proposed submission draft of the new Camden Local Plan. We trust that the comments presented in this letter are clear and informative and would welcome the opportunity to meet with you to discuss in more detail any issues or queries you may have.

Should you have any queries regarding this response or require additional information or guidance on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

Mohammad Ahmed
Planning Specialist

[Redacted signature block]

[Redacted footer block]

Date: Fri, 27 Jun 2025 17:55:38 +0000
From: Natalie Nguni
To: PlanningPolicy
Subject: Camden local plan: objections to site c27 -land east of constable house, Adelaide Road (gypsy and traveller site)

Dear Camden Council Planning Department,

I am writing to formally object to the proposed use of the green space adjacent to my home at Eton Place as a designated Gypsy and Traveller site.

This proposal raises a number of serious concerns for me and many other local residents.

Firstly, the patch of land in question is one of the very few remaining open green spaces in an area that is already densely developed and continuing to grow. With multiple residential properties currently overlooking the site — and new developments already underway — the pressure on local infrastructure, open space, and services is significant. Repurposing this land would represent a permanent loss of vital communal breathing space, impacting the overall quality of life for current and future residents.

Secondly, I am concerned about the potential for increased antisocial behaviour and crime that can sometimes be associated with transient or poorly managed sites. This is not a reflection of any group of people but a realistic concern based on experiences reported in other boroughs with similar developments. The potential impact on neighbourhood safety and the strain this could place on local policing resources should not be underestimated.

The charm and character of our community — defined by its relative peace, neighbourly feel, and balanced residential makeup — would also be at risk. Such a significant change in land use could alter the atmosphere of the area and create tensions that might otherwise be avoided with better consultation and planning.

I urge Camden Council to reconsider this location for the proposed site, and instead seek alternatives that are more suitable in terms of space, infrastructure, and community compatibility. I also request to be kept informed about the progress of this proposal and any public consultation opportunities.

Thank you for your attention to this matter.

Natalie Nguni

Date: Fri, 27 Jun 2025 18:52:16 +0000

From: Robert Englehart KC


To: planningpolicy@camden.gov.uk

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

I would be grateful if you would record my objection to your proposal to create gypsy and traveller accommodation in Adelaide road. I am particularly troubled by the proposed loss of amenity space and the over-population of the street.

Regards

Robert Englehart



Responder 660

Date: Fri, 27 Jun 2025 19:44:52 +0000
From: Negeen Arasteh
To: planningpolicy@camden.gov.uk
Subject: Objections to proposed gypsy and traveller site C27

Yours faithfully
Negeen Arasteh

FORMAL REPRESENTATIONS

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

Personal Details:

Name: Negeen Arasteh

[REDACTED]

[REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification proposed – Delete Site Allocation C27: Land adjacent to Constable House, Addelaide 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 nearby, not just visually, but socially and practically. Several key concerns make this location unsuitable for such an allocation:

- **Footfall and exposure/traffic:** The proposed site is basically adjacent to Chalk Farm station and also alongside the route to Primrose Hill. As such, there is already a lot of traffic (vehicles and pedestrians) in this immediate area and therefore already very noisy and busy. If this site was to be permitted, there would be a huge increase in noise and footfall which the area cannot sustain. Furthermore, there is already a lack of parking spaces for residents of this area and if the site was permitted, there would be more people trying to park and many would not be successful, having to park further away which is not safe or fair when everyone pays the same for permits.
- **Loss of privacy for residents/future occupants:** The site is in a very small enclosed area, with many residential buildings already surrounding it which would have their right of sight/light etc completely removed or impacted greatly. It therefore would very negatively impact those residential buildings but also the proposed gypsy & traveller site too.
- **No consultation:** I live very close to the proposed site yet I have received no formal consultation documents and only heard about this from word of mouth a few days

ago. It is why I am a few hours late in submitted these representations/objections, but if I had been properly notified, then I would have been able to comply. Thus the process is unlawful and undemocratic.

- Loss of playground and open space: The site proposed will mean that there will be a loss of green space and playground for nearby residents. Why should they suffer?
- Lack of information regarding the impact on schools, waste, sewage, infrastructure etc: How will these not be negatively impacted?
- HS2: The area and thus the residents have already been hugely impacted (negatively) by the ongoing, loud, disruptive HS2 works. If this site was progressed, there would be more disruption to the area.

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

Date: Fri, 27 Jun 2025 21:13:11 +0100

From: Nitzan Band

To: [redacted]

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

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

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

To whom it may concern.

My name is Nitzan Band, and [redacted]
[redacted]

I apologise for the late time, but I hope my concern will still be heard.

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

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

Deliverability is therefore highly questionable.

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

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

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

Conclusion and Requested Action

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

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

Thank you for your deep consideration,

Nitzan

Responder 662

Date: Fri, 27 Jun 2025 23:23:20 +0200
From: Caroline Cooper
To: [redacted]
Subject: Proposed travellers' site, Adelaide Road

[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.

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate page for each representation

Name or Organisation:

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

Documents can be found at the following links:

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

Paragraph

Page 294-5

Policy

H11

Policies Map

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

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

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

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

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

- | | |
|---|--|
| (1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements) | <input type="text" value="x"/> |
| (2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base) | <input type="text" value="x"/> |
| (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities) | <input type="text" value="x"/> |
| (4) Consistent with national policy | <input data-bbox="1235 1458 1251 1480" type="text" value="?"/> |

*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.

[REDACTED]

[REDACTED]

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

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

Caroline Cooper

[REDACTED]

[REDACTED]

[REDACTED]

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

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

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

☐

No

☐

Yes

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

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

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

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

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

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

11. Signature:		Date:	
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

Date: Fri, 27 Jun 2025 22:46:07 +0100

From: Shivani Jethwa

To: [redacted]

Subject: Objection to Proposed Gypsy and Traveller Site Near Constable House,
Chalk Farm

I am writing to formally object to the proposed allocation of land near my home as a Gypsy and Traveller site. While I fully support the need for inclusive and equitable provision for all communities, including Gypsy and Traveller groups, I believe this specific location is wholly unsuitable — both for existing residents and for any future occupants.

The land in question would displace one of the few communal spaces in the area: a small green area and a basketball court. Although the court is currently has poor drainage and signs of long-term neglect, it still serves as a local amenity and has the potential to be revitalised into a valuable community asset, especially for young people.

The proposed site sits directly adjacent to residential homes, raising serious concerns around privacy — for both current residents and any new occupants of the site. The lack of screening or separation makes the location inappropriate from a planning and community cohesion perspective.

The site also borders a busy main road, introducing additional risks related to air quality, noise pollution, and road safety. Most significantly, however, this site has been formally identified by the council in its own planning documents as an area at risk of flooding. Proceeding with residential development on land known to be vulnerable to flooding is highly concerning and raises serious questions about long-term safety and sustainability.

Residents are also already contending with complex local issues, including drug-related activity and antisocial behaviour that the council has failed to address. Adding further strain to an already stretched area without substantial mitigation is likely to increase existing tensions and reduce quality of life for all involved.

I therefore urge the council to reconsider this proposal and explore alternative, more suitable locations that better meet the needs of the Gypsy and Traveller community while protecting the wellbeing and integrity of the local neighbourhood.

Please confirm receipt of this objection and advise how it will be considered as part of the planning process.

Date: Fri, 27 Jun 2025 21:57:01 +0000

From: Adam Bier

To: planningpolicy@camden.gov.uk

Subject: OBJECTION RE: Camden Local Plan, Proposed Site Allocation C27

OBJECTION RE: Camden Local Plan, Proposed Site Allocation C27

Land adjacent to Constable House, Adelaide Road (Traveller accommodation)

I write to object strongly to and request deletion of plans to allocate Site C27 for Traveller accommodation as currently shown in Chapter 4, Table 5 of the central Camden Plan and as also included in Policy H11 of Chapter 7, Meeting Housing Needs and the Draft Policies Map and Schedule of Proposed Local Plan Site Allocations.

In my firm view the proposed site allocation is inappropriate and fully out of character with the area for the following reasons:

1) The site lies in an amenity area enjoyed by many local residents as a precious local green open space with flowers and many trees, including recently planted fruit trees.

It is vital that Camden protects the few open spaces it has still remaining as essential environmental lungs for the Borough and its residents.

2) The site was preserved as a playground for residents of Constable House and should be protected as such.

3) There is insufficient space in this part of Camden to accommodate new residents and traffic which would undoubtedly be created by travellers and their vehicles accessing the site.

4) The area is densely populated already with large historic mansion blocks and new apartments.

5) a gypsy and traveller site is totally inappropriate and totally unacceptable

Date: Fri, 27 Jun 2025 23:29:05 +0100

From: Jane Galton

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

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

My name is Jane Galton and [REDACTED].

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

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

1. Loss of Valued Community Amenity Space

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

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

2. Overlooking and Loss of Privacy

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

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

3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

therefore highly questionable.

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

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

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

Kind regards,

Jane Galton

Date: Fri, 27 Jun 2025 22:51:35 +0000

From: Dott. Ria

To: [redacted]

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

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Dear Camden Council

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

My address is [redacted postcode] and I am worried that the proximity to this identified site would be too close and putting our homes at risks, despite the area already been rather problematic since I moved here [redacted] years ago.

OUTLINE OF OBJECTION/REPRESENTATION

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

Dear Camden Council Policy Planning Team. 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

Further more

1. Strategic Under-Provision & Site Selection Concerns

The proposal only addresses six pitches across two borough sites- four at Freight Lane (King's Cross) and two here (fitzrovia.com, gamesmonitor.org.uk)-falling far short of the identified need of sixteen pitches.

Community advocates from Camden's Traveller community have expressed strong concern regarding the lack of genuine search and selection processes for suitable sites (fitzrovia.com), indicating the choice appears driven by land availability rather than informed, inclusive planning.

2. Incompatible Urban Context & Transport Pressures

The proximity to Chalk Farm underground station and high-density urban developments means the site risks exacerbating traffic congestion, increasing noise pollution, and compromising pedestrian safety.

There is no evidence of a Traffic or Transport Impact Assessment supporting this location's suitability amid heavy pedestrian and vehicular flows.

3. Insufficient Infrastructure & Amenity Provisions

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

4. Inadequate Community Consultation & Policy Transparency

Camden Council's method of site identification did not sufficiently involve local residents or Traveller community members in a transparent dialogue for this location .

The absence of a published, formal pitch allocation policy, despite being flagged as in development, means the proposal lacks the necessary policy framework to ensure equitable, sound decision-making (fitzrovia.news.com).

5. Risk of Incremental Expansion & Precedent Concerns

Refusing thorough environmental and Green Belt impact assessments risks allowing incremental growth, leading to densification beyond the stated two pitches-an outcome communities have repeatedly encountered in other boroughs (insidehousing.co.uk).

For example, Argyle Traveller sites in other London boroughs have repeatedly faced expansion after initial "small" allocations.

National authorities, including the Secretary of State, have blocked similar sites in green belt and open-space areas on grounds of openness loss and lack of very special circumstances (insidehousing.co.uk).

6. Conflict with Planning Policy & Soundness Requirements

Camden's Local Plan and the NPPF require that Traveller site allocations must not compromise safety, amenity, service provision, or environmental integrity-all of which are demonstrably at risk here absent a proper assessment.

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

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

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

Conclusion

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

The sudden addition of the site, without robust evidence or planning justification, places the plan at risk of not being 'sound' under legal scrutiny.

Request for Action

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

Withdraw the Constable House/Adelaide Road site from the Local Plan.

Publish a formal Traveller Pitch Allocation Policy, aligned with Camden's 10-year need.

Engage meaningfully with both the Traveller community and residents, collaboratively identifying sites that are equitable, sustainable, and supported by planning evidence.

Undertake comprehensive assessments (transport, utilities, environment) and follow transparent decision-making protocols.

I am available to discuss further or propose alternative sites that meet both local housing needs and urban planning standards.

Yours faithfully,

Dr Ria

A solid black rectangular box used to redact the signature of Dr. Ria.

Date: Fri, 27 Jun 2025 22:54:11 +0000

From: Grace Moynihan

To: PlanningPolicy

Subject: Complaint against proposal - Chalk Farm allocation of space as gypsy and traveller site

I am writing with regards to the proposal of allocating an area by Chalk Farm Station to be a gypsy and traveller site.

I would like to make a complaint against this proposal.

Having an area that encourages a transient community is not appropriate for the residential area that [REDACTED] is.

Also, currently this space is a green area, which there isn't much of, and therefore removing it would be the overdevelopment of an area.

Kind regards

Grace Moynihan

Date: Sat, 28 Jun 2025 05:17:48 +0000
From: Gregory Blaxland
To: planningpolicy@camden.gov.uk
Subject: Draft Camden Local Plan Review - Regulation 19 Consultation Response

Gregory Blaxland

[REDACTED]

[REDACTED]

[REDACTED]

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Your ref: Draft New Camden Local Plan Regulation 19 Consultation
Email: [REDACTED]
Date: 27 June 2025



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

For the attention of Planning Policy Team

Dear Madam/Sir

Representation in respect of Site Allocation C23 Bacton estate, Haverstock Road and otherwise known as Bacton Phase 2 ('the Site')

Quod are instructed by Mount Anvil ('MA') to submit representations in respect of the allocation of land known as Bacton estate, Haverstock Road and otherwise known as Bacton Phase 2 ('the Site'). The Site is allocated under 'Site Allocation C23' in the Draft New Camden Local Plan Proposed Submission Draft (April 2025) ('DNCLP').

MA is preparing a full planning application for the redevelopment of the stalled Bacton Phase 2 Site for residential development. MA therefore has a valid interest in ensuring that the allocation is fit-for-purpose to deliver housing for the borough, the need for which has become acute. This includes ensuring that the Local Plan, including its allocations, are also fit-for-purpose, accurate and meet the soundness tests prescribed in the National Planning Policy Framework ('NPPF').¹

For the DNCLP to be found sound it must be:

- a) Positively prepared;
- b) Justified;
- c) Effective; and
- d) Consistent with national policy.

This response is focused on policies within the DNCLP and the Site Allocation where they may affect the emerging proposals at Bacton estate, but also draws on broader issues that are relevant to the delivery of housing in the borough. It highlights factual inaccuracies in the draft Site Allocation that need to be addressed. The representations are prepared to ensure DCNLP is in a state where it can

¹ NPPF Paragraph 36

Quod | [REDACTED]





be found sound when examined by the Planning Inspectorate on behalf of the Secretary of State. As currently drafted and for the reasons set out in these representations, it is considered that the plan is **not sound** and that significant modifications are necessary.

We respectfully request that the Camden Local Plan and Planning Policy team take this note into consideration and make the modifications to the DNCLP as suggested.

1 Background – Bacton Phase 2

- 1.1 Planning permission was granted for the regeneration of the Bacton estate Site first in 2013. Planning permissions (2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/P) ('the Extant Planning Permission') approved 314 homes in total across phases 1 and 2. Phase 1 delivered 67 homes which are all now complete and occupied. The Extant Planning Permission, however, allows for the delivery of 247 homes on the Phase 2 Site (comprising 176 market sale homes, 61 social rent homes, and 10 intermediate rent homes).
- 1.2 The Phase 2 Site was cleared in 2017 and has remained vacant since due to significant viability challenges in delivering the Extant Planning Permission. This is despite significant efforts on the part of Camden's Community Investment Programme ('Camden CIP') to unlock the Site for development.
- 1.3 As of 2024, Camden Council have entered into a partnership with MA to deliver Bacton Phase 2 following a robust and competitive tender process. Since then, MA have engaged extensively with planning officers and the local community to formulate proposals that optimise the Site's capacity to deliver residential development.

2 Consistency with national policy

- 2.1 The Government made important amendments to the National Planning Policy Framework in December 2024, which were expressly geared towards making sure that it better reflects their ambition to deliver 1.5 million homes within this parliamentary term. Government have made this ambition central to their national agenda, on which they were elected with a significant majority.
- 2.2 Annex 1 of the NPPF (2024) sets out the transitional arrangements. Paragraph 234 clearly states that for the purpose of preparing local plans, the December 2024 version of the NPPF will apply from 12th March subject to where certain caveats set out in limbs (a) to (e) of the paragraph apply. If any of those do apply, paragraph 235 of the NPPF (2024) states that "*the plan will be examined under the relevant previous version of the Framework.*" Limb (d) is the relevant caveat for the DNCLP as it is a local plan for an area where there is an operative Spatial Development Strategy (i.e., the London Plan 2021). Limb (d) makes clear that the caveat only applies where "*the local plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025.*"



- 2.3 Footnote 82 then clarifies that *“Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In this context “reached Regulation 19” refers to when Regulation 19 has been complied with (i.e. when the planning authority has made a copy of each of the proposed submission documents and a statement of the representations procedure available, and the statements required in Regulation 19(b) have been sent to consultation bodies).”*
- 2.4 The Regulation 19 consultation on the DNCLP only began on 1st May 2025, well after the 12th March transitional date. It is clear therefore that the DNCLP should be prepared in accordance with the NPPF (2024).
- 2.5 It is not clear, therefore, why the Council has published evidence that still relies on the previous version of the Framework. The Local Housing Needs Assessment, despite having a date of May 2025, makes clear at paragraph 1.8 that *“this report was developed and written under the NPPF 2023 and therefore has not incorporated any of the changes to the NPPF.”* The report goes on to state that the objectively assessed need for housing in Camden as calculated through the standard method *“is unlikely to become relevant to Camden for planning purposes.”* The reason that it is not used for the purpose of formulating a housing requirement is acknowledged and understood. It is disappointing nonetheless that the Council has appeared to deliberately disregard the Government’s own objective assessment of need as irrelevant. That need is based on delivering the 1.5 million homes in this parliamentary term, an objective that the Government have made central to their national manifesto.
- 2.6 On this basis the DNCLP could be considered to be neither positively prepared nor consistent with national policy and therefore unsound.

3 Housing

- 3.1 The DNCLP Policy H1 states that *“the Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41.”*
- 3.2 Procedurally, the DNCLP is required to meet with the housing targets set by the London Plan 2021. These targets are based on capacity assessments from the 2017 Strategic Housing and Land Availability Assessment (SHLAA) and end in 2029, after which point the Council has opted to revert to the SHLAA figures for the remainder of the plan period. The result is that the Council are planning for an average of 707 homes per annum across the plan period, a figure lower than the adopted target, which is already failing to deliver a sufficient number of homes.
- 3.3 The targets set by the London Plan 2021 (LP21) are widely acknowledged to be a poor reflection of actual housing need in London. During the 2019 examination of the Plan, the Panel of Inspectors concluded that the targets fell short—“by some margin”—of meeting the identified annual need of 66,000 homes. The Panel described this shortfall as a “major concern” and even considered whether the Plan should be deemed unsound and potentially withdrawn. Despite these reservations, the Panel ultimately recognised the detrimental impact that delaying



adoption could have and therefore urged boroughs to “*use all the tools at their disposal*” to ensure homes are delivered.²

- 3.4 The Council have cited paragraph 4.1.11 of the London Plan 2021 in justifying this approach. That paragraph is however not prescriptive and leaves room for judgement in how a target for the period beyond 2028/29 should be applied. The Council have made the decision to plan for a lower number of homes despite the increasing severity of the housing crisis in the borough.
- 3.5 Paragraph 2.8 of the DNCLP states that the overall housing target “*factors in the London Plan housing target for Camden of 1,038 homes per year for the first three years of the Plan period (2026/27, 2027/28 and 2028/29), and also includes the cumulative backlog from under-delivery of completed homes from 2019/2020 (the first year of the London Plan period).*” However, the DNCLP does not make the scale of the ‘backlog’ clear. Quod estimate based on GLA datahub information that between the adoption of the Camden Local Plan in 2017/18 and 2023/24, the shortfall has reached 2,702 homes. The DNCLP does not make clear how this shortfall is addressed and over what period. This must be made clear in order for the DNCLP to be justified and without this information the DNCLP cannot be considered sound.
- 3.6 The above notwithstanding, taken as an average across the draft plan period the housing target set out in draft Policy H1 equates to just 770 homes per annum. 3,114 of these homes are planned for the first three years of the plan period. Beyond that point, the Council are planning for just 427 homes per year for the remainder of the plan period; less than half of the current London Plan target and only 13.6% of the Government’s own objectively assessed need for housing in Camden using the standard method. The Council have chosen not to prepare their own evidence.
- 3.7 This is in the context of:
- An increase in the number of households in temporary accommodation in Camden from 498 in 2019 to over 1000 in March 2025;³
 - The forecasted spend on tackling homelessness for 2024/25 being £39 million;⁴
 - There being over 8000 households on Camden’s housing register, an increase of 58% since 2016;⁵ and
 - House prices rising by 73% in the last 15 years.⁶

² Paragraph 175 - *London Plan Examination in Public: Panel Report October 2019*

³ Report to Council: Themed Debate – Homelessness and Temporary Accommodation. 7th April 2025. Available online [here](#). Paragraph 2.2.

⁴ Ibid.

⁵ Risk Deep-Dive – Increasing Homelessness; Report to LB Camden Audit and Corporate Governance Committee. 3rd April 2025. Available online [here](#). Paragraph 3.3

⁶ Themed Debate – Homelessness and Temporary Accommodation, para. 2.7.



- 3.8 By planning for just 770 homes per annum, the DNCLP is failing to use all tools at its disposal to positively prepare a plan that addresses these very real issues that have been caused by a severe lack of housing delivery in the borough. Nor is this target sufficiently justified with reference to up to date evidence of need. The Local Housing Needs Assessment (May 2025) referred to earlier does not seek to come to a ‘true’ understanding of the housing need in the borough. Instead, it reverse engineers the analysis, treating the housing target of 11,550 as ‘read’ and only seeking to “*understand the mix of housing which is required within this total.*”⁷ That same report does though offer insight into the need for housing and affordable housing in the borough. It shows that there is a need for 8,239 new affordable homes in the borough.⁸ Viably delivering this number of affordable homes requires a much greater total number of homes. The Council’s decision to revert to a ‘do minimum’ approach beyond the London Plan target period cannot therefore be considered to be justified or effective in tackling the housing crisis in London.
- 3.9 The Mayor of London has acknowledged the need to plan for a significantly higher target of 88,000 homes per annum in their London Plan consultation, this is in recognition of the essential role London must play in delivering the Government’s ambition to build 1.5 million homes over the parliamentary term. The Mayor wrote in response to the Regulation 19 consultation held by LB Hounslow on their draft Local Plan 2020-41 the following:
- “Post 2029-30, LBH’s intention is to follow the guidance in paragraph 4.1.11 of the LP2021. The result of this is a falling housing target year to year which is lower (from 2031 onwards) than the borough’s current one. The Mayor considers that it is important for LBH to recognise that the LP2021 does not meet London’s identified housing need and furthermore - given the context that London is now working towards delivering 80,693 homes per annum – this means that the overall amount of housing required annually should not be expected to reduce beyond 2029. The Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will apportion targets across boroughs. Recognition of this context (of increased need) would be a useful consideration when planning for housing. At this time, it is the Mayor’s preference that LBH roll forward their current borough housing target beyond 2029.”*⁹
- 3.10 In order for the DNCLP to be found sound, it must plan for a level of housing delivery that reflects the real and acute need in the borough and nationally. This means, as a minimum, reflecting the recommendations of the Mayor of London and carrying forward the London Plan 2021 annual housing requirement for the entirety of the DNCLP period, pending a review of the London Plan itself.

⁷ Camden Local Housing Needs Assessment (May 2025). Paragraph 1.1.

⁸ Ibid., Figure 40.

⁹ Mayor London’s response to the Proposed Submission Version of the Hounslow Local Plan 2020-2041 Regulation 19 consultation. 25th October 2024.



- 3.11 Without this change, the DNCLP cannot be considered to have been positively prepared nor consistent with national policy.

4 Optimising sites to deliver housing

- 4.1 Section 6 of the DNCLP refers to appropriate density under paragraph 7.31. It states:

“Taking account of the Sustainable Residential Quality 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.”

- 4.2 However, under the DNCLP, the approach to density has not been reviewed. It continues to rely on outdated density ranges drawn from the London Plan 2016 Density Matrix. This matrix was explicitly departed from with the publication of the London Plan 2021. The Planning Inspector 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.”*¹⁰
- 4.3 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.”*¹¹
- 4.4 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 DNCLP 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 (i.e., the London Plan 2021).

5 Site Allocation – C23 Bacton Low Rise, Haverstock Road

- 5.1 The DCNLP Site Allocation C23 sets an *“indicative housing capacity”* of 148 homes for the Site. This capacity is based on Phase 1 having delivered *“166 new and replacement homes”*. **This is incorrect and needs to be amended;** Phase 1 delivered 67 new and replacement homes,¹² each of which is now completed and occupied. The remaining number of homes consented to

¹⁰ Paragraph 280 - London Plan Examination in Public: Panel Report October 2019

¹¹ Paragraph 2.2 - London Plan 2017 Topic Paper - Housing Density

¹² Known as Cherry Court.



be delivered in Phase 2 is **247**, totalling 314 home across both phases. 247 homes have not been built pursuant to the Extant Planning Permission.

5.2 In order for the Plan to be positively prepared and to be consistent with national policy,¹³ the *indicative housing capacity* should be clearly labelled as a minimum and reflect the number of homes consented by the Extant Planning Permission. The current indicative housing capacity of 148 homes is inconsistent with the Extant Planning Permission and factually incorrect. Site Allocation C23 is therefore not positively prepared nor is it justified, as it is factually incorrect and does not, as a minimum, seek to meet the Council's objectively assessed need nor is it consistent with national policy..¹⁴ The *indicative housing capacity* for Site Allocation C23 should be 247 homes but importantly the Site Allocation must also make clear that this is a minimum figure and that proposals for more homes will be supported where they are justified.

5.3 Suggested corrections to Site Allocation Policy C23 (as set out in Table 5 of the DNCLP) in light of this are set out below to ensure this aspect of the DNCLP is sound are as follows:

"Planning permissions (2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/P) approved 314 homes in total. Phase 1 delivered 67 466- new and replacement-homes. The Site has an extant planning permission to deliver the remaining 247 homes across Phase 2. The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 40m 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."

5.4 Without these changes, the policy is not effective nor justified and therefore unsound.

Summary

Thank you for taking the time to consider these representations to the Regulation 19 consultation on the DNCLP. For London – and therefore the UK – to deliver the number of homes that it needs it is essential that there are positively prepared plans in place that properly reflect the ambitions of government and the soundness tests of the NPPF. For the reasons set out above, it is considered that the current draft of the DNCLP would not pass those soundness tests and requires comprehensive revisions for it to be made so. As a minimum, the Mayor's recommendation of carrying forward the London Plan target for the entirety of the DNCLP period, pending the strategic review of housing need in the capital and the adoption of an updated London Plan. To meet this increased requirement, the Council are encouraged to revisit the capacity assumptions that are set out in the

¹³ NPPF Paragraph 36(a).

¹⁴ NPPF Paragraph 36(d).



various site allocations and formulate policy that can better accommodate proposals for high quality, high density development and allow positive decision making based on the proposals at the time. This would in turn bring the DNCLP into greater conformity with the London Plan, as is legally required.

Should the Council wish to discuss any of the issues set out herein, please do not hesitate to contact us.

Should this version of the DNCLP progress to submission and examination, Quod and Mount Anvil request the right to appear in the local plan hearings and make further representations.

Yours sincerely

Gregory Blaxland

[REDACTED]

cc.

[REDACTED]

Date: Sat, 28 Jun 2025 19:05:25 +0100
From: Primavera Boman
To: [redacted]
Subject: re: a Gypsy and Travellers Site proposal

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Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Kind regards,
Primavera Boman

Date: Sat, 28 Jun 2025 20:45:09 +0100
From: Lily Mae
To: [redacted]
Subject: Objection to Proposed Gypsy and Traveller Site Allocations in Camden Local Plan

Dear Planning Policy Team,

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

While we recognise the need for inclusivity and housing for all sectors of society, including the Traveller community, we believe that these proposed sites are not suitable for the following reasons:

1. Negative Impact on Residential Amenity

Both sites are located in close proximity to established residential communities. Introducing additional housing on these small parcels of land—particularly the Constable House site, which is extremely limited in space—risks creating issues of:

Overcrowding,
Noise pollution,
Loss of daylight and privacy,
Reduced air quality, and
Increased pressure on shared amenities.

2. Littering and Waste Concerns

Existing traveller sites across the UK have, in some cases, led to increased littering and improper waste disposal.

Despite Council management plans, residents are worried about the site being inadequately maintained, affecting cleanliness, hygiene, and attracting vermin.

3. Loss of Potential for Broader Community Benefit

The selected sites could serve better purposes, such as:

Affordable housing units for families on long waiting lists,
Community green space,
Local business support,
Playgrounds or facilities for young people.

These uses would align more broadly with the needs of the wider local population.

4. Traffic, Parking, and Access Issues

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

5. Site Unsuitability and Space Constraints

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

6. Security and Social Cohesion

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

7. Negative Impact on Property Values

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

8. Alternative Options Not Fully Explored

The decision to select these two sites appears based on an exclusion process rather than an affirmative demonstration of suitability. From the FAQ document, 16 of the 18 originally identified sites were ruled out. This does not necessarily mean the remaining two are genuinely fit for this specific purpose.

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

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

Thank you for your attention to this matter.

Kind regards,

Lily Katz

Date: Sat, 28 Jun 2025 20:46:01 +0100
From: Ruby Daitz
To: [redacted]
Subject: Objection to Proposed Gypsy and Traveller Site Allocations in Camden Local Plan

Dear Planning Policy Team,

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

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Thank you for your attention to this matter.

Kind regards,

Ruby Daitz

Date: Sat, 28 Jun 2025 19:46:18 +0000
From: Sophie
To: PlanningPolicy
Subject: Objection to Proposed Gypsy and Traveller Site Allocations in Camden Local Plan

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

Thank you for your attention to this matter.

Kind regards,

Sophie Cohen
[redacted address]
[redacted postcode]

Date: Sun, 29 Jun 2025 11:21:47 +0000
From: Ron Ganbar
To: PlanningPolicy
Subject: Kentish Town Nature Corridor



Dear Camden Planners

We are writing to you in support of the proposed Nature Corridor mentioned in the policies listed below:

Policy Number:

Policy C1, paragraph 19 for Central Camden

Policy N1, paragraph 7 for North Camden

This proposal is already supported by a number local community groups and we wish to add our individual support for this thoughtful project.

We do understand the need for increased housing in the area, but also believe in the importance of adequate and well thought out and designed green space throughout any new building developments.

This ingenious plan has the benefit of providing continuous green spaces which will both support biodiversity as well as the health and well being of people living locally. This plan has the advantage of linking these principles throughout a number of areas and proposed developments.

Developers will always use the words 'green spaces' and 'well being' but we put our faith (and hope!) in Camden, as the planning authority, to ensure that there is genuine and adequate adherence to the clearly thought out plans integral to the proposed Nature Corridor.

Yours sincerely,
Ron Ganbar

Date: Sun, 29 Jun 2025 20:25:50 +0800

From: Rikka Li

To: [redacted]

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

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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,

Me and all our residents in [redacted] strongly reject this sudden shock. No way, absolutely NOT! Do not go ahead. If in any way if you are suggesting it again; we will protects against you.

[redacted]

Pls see our joined comments:

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

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

Deliverability is therefore highly questionable.

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

explainable);

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

Regard

Qing Li

Sent from my iPhone

Date: Sun, 29 Jun 2025 08:54:17 -0400

From: Justin Nichomoff

To: [redacted]

Subject: proposal for a Gypsy and Traveller accommodation - recommendation to Delete Site Allocation C27: Land Adjacent to Constable House Adelaide Road

I

have been out of town and was only recently made aware of this proposal. In response I would strongly request that the council delete site allocation C27: Land Adjacent to Constable House Adelaide Road from the proposal altogether.

In

particular, site C27 should be deleted from the following:

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

As a resident, home owner, and council tax payer I do not believe this is an appropriate location for such an accommodation, with clear lack of services needed support the additional population including rubbish removal and other sanitary concerns, not to mention the increased density in an already busy area.

I would specify that the plan does not fully comply with Duty to Cooperate nor that the plan is sound and positively prepared.

Thank you for your consideration,

Justin Nichomoff
[redacted address]



Date: Sun, 29 Jun 2025 21:32:22 +0000
From: Jessica Learmond-Criqui
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan - Objection to allocation of Site C27 (land east of Constable House, Adelaide Road, [redacted postcode])

Apologies for sending this after 5pm on Friday. My first attempt to send this email bounced back as undelivered. Am trying again.

Representation Objecting to the Allocation of Land East of Constable House, Adelaide Road (Site C27) for Gypsy and Traveller Accommodation

To: Camden Council Planning Policy Team

I write to formally object to the proposed allocation of Site C27 for use as a Gypsy and Traveller site for the following substantive reasons:

1. Unsuitable for residential accommodation due to flood risk

The site is identified in Camden's own evidence base as subject to surface water flood risk, corroborated by the "Flood Streets 2021" dataset. Locating a vulnerable residential use, such as a Traveller site with caravans, in an area of known flooding risk is contrary to the Government's Planning Policy for Traveller Sites (PPTS) 2023, which explicitly states Traveller sites should not be located in areas of high flood risk, given the vulnerability of caravans and the serious safety concerns during flood events.

2. Severe amenity and overlooking impacts

The site lies immediately adjacent to Constable House, a multi-storey residential block. Any Traveller site on this land would be overlooked by numerous habitable windows, creating a significant and unacceptable loss of privacy for both existing residents and future Traveller residents. Government guidance (Designing Gypsy and Traveller Sites, 2008, para 4.14) stresses the importance of privacy and community cohesion; the proximity and orientation of Constable House makes this impossible to achieve without severe and ongoing amenity conflicts.

3. Loss of local green space and community benefit

The land east of Constable House includes green space and hardstanding which currently contributes to the visual amenity of the local area and potentially to informal recreation for residents. Redevelopment would result in the loss of green space in a densely populated area with very limited outdoor amenity, conflicting with Camden Local Plan Policy A2 (Open Space) and the London Plan Policy G4, which prioritise the retention and enhancement of local green space for community health and well-being.

4. Poor site access and connectivity

Access to the site is constrained by the tight urban context of Adelaide Road, with limited safe turning or circulation space for large vehicles including emergency services or touring caravans. This raises serious concerns about highway safety and service access. Additionally, the site is separated from surrounding community services by busy roads and is not well integrated, undermining the aims of the PPTS and Camden's Policy H11, which seek to ensure Traveller sites are sustainably located and well-connected.

5. Proximity to significant noise and air pollution

Adelaide Road is a heavily trafficked corridor with elevated air pollution and noise levels, already identified as a constraint in the site assessment. Traveller communities, which include children and older people, should not be exposed to high pollution levels. This directly conflicts with the PPTS 2023 requirement to protect the health of Traveller site residents and the NPPF (2023) objective to promote healthy places.

6. Failure of fair process and engagement

The AECOM report explicitly confirms that no community engagement was undertaken during the site selection process, contrary to Policy A of the PPTS 2023, which requires early and effective consultation with settled and Traveller communities. It is fundamentally wrong to allocate such a controversial site without any transparent community dialogue or site-specific impact assessment on the ground.

Conclusion

In summary, Site C27 fails on grounds of flooding, amenity, accessibility, health, community cohesion, and fair process. Camden Council's own Local Plan and national policy frameworks make it clear that Traveller sites must be safe, healthy, accessible, and deliverable. This site is not.

I therefore urge Camden Council to remove Site C27 (land east of Constable House, Adelaide Road) from further consideration for Traveller site allocation in the Local Plan.

Yours sincerely,

Jessica Learmond-Criqui

Date: Mon, 30 Jun 2025 07:14:46 +0000
From: Barry Dawson
To: PlanningPolicy
Subject: FW: Land east of constable house [redacted postcode]

Barry Dawson

Information and Monitoring Officer

[redacted]

[redacted]

From: Planning <[redacted email]>

Sent: 26 June 2025 15:07

To: Barry Dawson <[redacted email]>

Subject: FW: Land east of constable house [redacted postcode]

-----Original Message-----

From: kathy cohen <[redacted email]>

Sent: 24 June 2025 09:32

To: Planning <[redacted email]>

Subject: Land east of constable house [redacted postcode]

[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.

Application as an area to site gypsies and travellers, Title no
NGL 454800:

I am a resident of the area, [REDACTED]

I have tried to read the 61 page report with no real understanding why this plan, which only came to my attention yesterday, given 4 days to reply, is too complicated to understand.

I am [REDACTED] not a lawyer.

I wish to record my objection to this plan as I think it is entirely inappropriate to have a site so near to the tube station, which I frequently use at night.

I can't say what impact it will have on our tranquil community as I have no experience of such communities living in an urban area. Nor do I know whether they will live in tents, whether there will be toilets or what other facilities are involved.

This 'consultation' is obviously not meant for the general public like myself and I do resent the way it has been presented to the general public.

Please consider the impact of this move very carefully and give people like myself a reasonable voice to express their reservations
Kathy Cohen Sent from my iPad

Date: Mon, 30 Jun 2025 07:43:32 +0000
From: Planning
To: PlanningPolicy, Barry Dawson
Subject: FW: Camden Local Plan: objection to site C27 - Land east of Constable House

Dear Sir/Madam


I want to register my objection to the proposal to create a traveller site at site C27 in Belsize Park.

The land proposed is a confined site, within inadequate access, particularly for frequent moves of large vehicles. Neither the site nor the access are large enough for the proposed use.

The site is also surrounded by substantial developments and large blocks, and there is no proposal to increase the access.

The north of Camden Town already represents a high crime area, which is inadequately policed, and the proposal to add a site which is intended to house a community which is not settled - and which will therefore inevitably have a frequently changing population - implies an increased need for policing, social service and other similar provision, for which no plan is advanced.

Regards,

Sebastian Isaac - 

Disclaimer

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This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

Date: Mon, 30 Jun 2025 08:14:12 +0000

From: Mike Johnson

To: planningpolicy@camden.gov.uk

Subject: Camden basement planning policy consultation - objections / responses

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

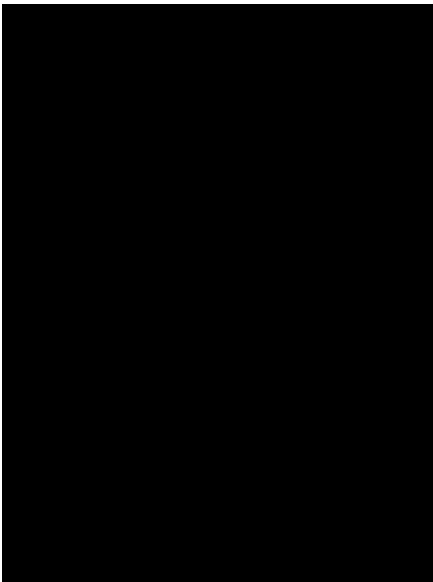
Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="James"/>	<input type="text"/>
Last Name	<input type="text" value="Hayward"/>	<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"/>

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: Pile Designs 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"/>

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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 we are a small specialist design consultancy who work in this sector.

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

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

(Continue on a separate sheet if necessary)

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

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

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

(Continue on a separate sheet if necessary)

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

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

No

No

Yes

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

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

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

Privacy Notice

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

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

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

11. Signature:		Date:	26 th June 2025
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Notes to accompany the Representation Form

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

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

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- ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Mike"/>	<input type="text"/>
Last Name	<input type="text" value="Johnson"/>	<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: PD Geostructures 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"/>

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

I would like to add that we are a small company who work predominantly in this sector.

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

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

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

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- ***Justified***

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

- ***Effective***

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Date: Fri, 27 Jun 2025 16:28:34 +0100

From: Richard

To: [redacted]

Subject: Objection to site C27 - Land East of Constable House, Adelaide Road

[[redacted email] appears similar to someone who previously sent you email, but may not be that person. Learn why this could be a risk at <https://aka.ms/LearnAboutSenderIdentification>]

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

I am writing to object to the proposal C27 - Land East of Constable House, Adelaide Road

Site C27 should be deleted from:

Chapter 4 Central Camden. Table 5

Chapter 7 Meeting House Needs Policy H11

Draft policies Map and Schedule of Proposed Local Plan Site Allocations

C Harman

[redacted] [redacted postcode]

First I wish to complain about the lack of public consultation and the very muddled information being supplied where the plans shaded land which, it now transpires, may not be part of the proposed development.

My objections are that this area is already over-developed (and new, large volume development is currently under construction a few yards away from the proposed site at Chalk Farm tube). This is already an extremely densely populated area with considerable traffic congestion.

The proposed development area lacks any independent access and will only increase traffic congestion and make an already dangerous junction even more so for both road users and pedestrians.

Has any attention been paid to the fact that this area floods in wet weather?

Has anyone considered the impact of the loss of outdoor space, already a very precious commodity in this tightly packed corner which is already overlooked on all sides by tall buildings?

Given the site is actually listed on ordnance survey as a play area, this is the purpose to which it ought to be put. There should be play facilities but ideally for all ages. There could be a baseball hoop, an outdoor ping pong table, plus swing or climbing frame. Neighbours should have a say and should be consulted. I would also like to see a drinking water fountain as so many people frequent this area en route to buses and the tubes, this would also cut litter from plastic bottles. Ideally there ought also to be a solar powered public toilet nearby as this area is very poorly

served in this respect and no thought is given to public sector workers who might need facilities as they patrol our streets and drive our ambulances.

Any further increase in population in this densely populated corner will also make it even harder to get a GP appointment.

Please consider my objections.

Thank you.

Date: Mon, 30 Jun 2025 16:56:51 +0100

From: Sam Talbot

To: [redacted]

Subject: Objection to Proposed Gypsy and Traveller site near Chalk Farm

[redacted] to the proposed site and would like to object with these important reasons

- The site is tiny and oddly shaped, raising real concerns about whether it can safely fit a Traveller community with enough space for living, facilities, and vehicles.
- It's right next to Constable House and opposite the Etons, with hundreds of new flats going up nearby, all adding pressure on local services like GPs, parking, and drainage.
- The location risks creating noise, light, and privacy issues for nearby residents, with little room for proper screening due to how built-up the area is.
- Traffic on Eton College Road and Adelaide Road is already heavy, more caravans and support vehicles will only make it worse and pose a safety risk.
- Developing the site would harm air quality and green space, going against the Council's own climate and pollution goals.

I really do hope you take this into consideration before making any decision that is so crucial to the local community

Sam Talbot

[redacted address]

[redacted]

[redacted postcode]

Dear Camden Council,

I am writing to express my concern regarding the proposed construction of a Gypsy and Traveller site near Constable House and Eton Villas.

While I support the need for inclusive and secure accommodation for all communities, the chosen location appears wholly unsuitable for a number of serious reasons:

1. Overcrowding and Visibility: The site is in an already densely built-up area, overlooked by several buildings over four storeys high, including Eton Place and the new Chalk Farm development. It lacks privacy and appropriate separation from surrounding residential and commercial areas.
 2. Insufficient Space: The proposed site is smaller than Camden's own minimum recommended size, raising questions about its suitability for long-term habitation and family life.
 3. Unpleasant and Unsafe Environment: It borders a main road, an active railway line, and an ambulance route—making it noisy, polluted, and generally unpleasant. This is not a healthy or respectful environment for new dwellings.
 4. HS2 Construction Disruption: The area will be heavily impacted by HS2-related works for years to come. This site would further increase local congestion and disruption during that period.
 5. Loss of Community Space: The proposal involves the removal of green space and a children's playground currently used by residents of Constable House. Local residents appear unaware of the plans and have not been meaningfully consulted. Negative Community Impact: The area is one of high foot traffic, particularly from Chalk Farm Station to Primrose Hill. The site would be highly exposed, with very limited privacy for its residents. Additionally, it would likely require increased policing and services in an already busy part of the borough.
- Given all the above, I respectfully request that Camden Council reconsider this location and instead pursue alternatives that are more appropriate, safe, and welcomed by the communities they are meant to serve. I would also urge the Council to engage in a transparent consultation with both local residents and the Traveller community before proceeding any further.

Thank you for your time and attention to this matter.

Daniel Supperstone

Date: Thu, 26 Jun 2025 13:26:29 +0000
From: Linda Seward
To: PlanningPolicy
Subject: Camden Local Plan objection

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate page for each representation

Name or Organisation: Linda Seward

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

Documents can be found at the following links:

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

Paragraph

Policy

H11
Pages 294-5

Policies Map

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

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

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

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

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

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

I consider the Camden Local Plan Submission Draft to be **unsound**, as it is neither **justified** nor **consistent with national policy**, particularly in relation to the identification of potential sites for **Gypsy and Traveller accommodation**, especially one so near to a quiet residential community.

The selection of this site lacks sufficient local evidence or clear justification. There is no proper assessment of site-specific constraints—such as access, infrastructure capacity, environmental impact, or compatibility with the area’s character. This fails the “justified” test under **paragraph 35 of the National Planning Policy Framework (NPPF)**, as the plan does not show that this is

the most appropriate site when compared with reasonable alternatives, based on proportionate evidence.

There has been a lack of meaningful public engagement at this stage. Including specific sites in the draft plan risks pre-empting future planning decisions, without the necessary consultation and scrutiny that would usually accompany a formal application. This undermines public trust and fails to meet national policy requirements for community involvement in plan-making.

It is unclear how the Council has met its **duty to co-operate** under **Section 33A of the Planning and Compulsory Purchase Act 2004**. Identifying specific sites for Gypsy and Traveller accommodation requires cross-boundary collaboration to ensure fair and proportionate provision across boroughs. The draft plan does not provide sufficient evidence that Camden has worked constructively or actively with neighbouring authorities on this matter.

I feel that this plan does **not meet the legal tests of soundness or compliance** and should not proceed.

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

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

To make the Camden Local Plan more fair, balanced, and in line with national rules, the following changes should be made:

1. **Take out the site near Chalk Farm** from the list of possible Gypsy and Traveller accommodation sites—at least until a proper, site-specific assessment is done. This should look at things like access, local infrastructure, environmental concerns, nearby services, and whether the site fits with the character of the area. The plan should also show that this site was chosen based on solid evidence and only after considering other reasonable options.
2. **Be clear about how sites were chosen.** The plan needs to explain the process: how sites were identified, what criteria were used, what evidence supported those choices, and how local people's views shaped the decisions. That way, it's clear and fair, and meets the national planning guidelines.
3. **Improve public involvement** in the process. There should be a clear promise that any site being seriously considered will go through proper local consultation before being added to the final plan. This would help make things more open and help rebuild trust in how decisions are made.
4. **Show that Camden has worked with neighbouring boroughs** on this issue. Choosing sites for Gypsy and Traveller communities needs to be a shared effort across council boundaries. The plan should include proof that Camden has talked with and worked alongside other councils, as required by law.

Without these changes, the plan doesn't meet the necessary legal or planning standards. Making these adjustments would help ensure the plan is based on real evidence, respects local communities, and follows national policy.

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

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

☐

No

☒

Yes

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

I have serious concerns about the proposed inclusion of a site near my home as a potential location for Gypsy and Traveller accommodation. While I am unable to attend in person, I believe it is essential that someone speaks on my behalf to properly convey these concerns—and I know there are several local people who will be wanting to speak. I feel that written comments alone may not fully capture the detailed, site-specific issues or reflect the strength of local feeling about this proposal. I am also concerned that, without a voice in the hearing, the views of local residents like myself may be underrepresented in a process with potentially long-lasting effects on our community and on trust in the planning system.

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

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


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

Privacy Notice

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

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

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

11. Signature:		Date:	26 June 2025
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Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

• ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

To: Camden Council Planning Policy

Date: 27 June 2025

Subject: Petition with Consultation Statement with Residents' Comments

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

Dear Rebecca Burden,

Please find enclosed our Consultation Representation that includes:

- 1) A Consultation Statement with Residents' Comments
- 2) A Petition

These documents relate to the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road, for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

We ask that the enclosed petition signed by Constable House, Adelaide Rd, NW3 3QA residents - including leaseholders and tenants - be accepted as part of the Regulation 19 consultation, June 2025.

I am sending the enclosed on behalf of the residents of Constable House (CH), NW3 3QA - tenants and leaseholders. The CH residents are a diverse community of people, and we decided that since not all residents are able to send in their own Consultation Representation form or an email/letter, we did not want them to be unrepresented in this consultation process as it is such a critical plan/allocation and an important issue that directly affects us all.

No formal consultation notice or information was sent to CH residents from the Council. Information about the London Borough of Camden Gypsy and Traveller Site Identification Study Local Plan, the Allocation of Site C27 and the Consultation period and deadline of 27 June was poorly communicated. Local Residents only found out about it through word of mouth. Subsequently all information was gathered and researched from a variety of sources and people.

Information was made available to all CH residents via flyers through letter boxes, posters in the building and around the Estate and through the establishment of 2 WhatsApp groups, a wider community group and 1 just for CH residents.

The process: Over a period of a few days, I went door to door speaking with everyone explaining the issue and discussing it with them. A printed sheet of information stating the requirements of Gypsy and Travellers' Accommodations (based on the information in the GTSIS document London Borough of Camden Gypsy and Traveller Site Identification Study), and details of the allocated site was also provided (in English).

Each person was then able to determine if they: Agree with the Proposed Allocation of Site C27, or: Disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list. And they signed the petition accordingly.

The Petition was devised in this manner in order to give all a fair say in the matter.

As the process developed and I had more and more conversations with more people, it became clear that it would also be good to document the CH residents' thoughts, assessments and views, as they would be stated in a Representation Form or an email/letter - and to include this with the Petition. The Statement and Residents' Comments section in this packet reflects the conversations I had with the residents.

- I spoke with 54 of the 63 CH flats/households.
- Of the 54 households I spoke with: 1 household had signed a petition circulated at Bridge House on Adelaide Rd; 1 household didn't speak enough English to understand the situation; 1 household didn't want to engage and wants to remain anonymous.
- I did not speak to the residents of 9 flats: 1 flat is empty and being completely renovated; 1 flat is occupied by an elderly woman who can't come to the door; 1 flat the residents are away on holiday; and the remaining flats, no one was home.
- I spoke with 78 people who have signed the petition.

The outcome of this direct, in person consultation process with Constable House residents is that 100% of the people I spoke with Disagree with the Allocation of Site C27 and want the Allocation removed from the Local Plan list. The consensus is that CH residents think the Allocation of Site C27 is not feasible, it is unsuitable, and it is not appropriate for the provision of Gypsy and Traveller accommodation.

Please note: In addition to signing the petition many of the residents will also be submitting their own consultation representations to the Planning Policy Department.

Ms Burden, thank you for accepting Constable House's Petition and the accompanying Residents' Comments and Consultation Statement document.

We look forward to hearing the results/analysis of this consultation and the inspectors' remarks/decisions when they are complete.

Yours sincerely,

Kim Jacobson



To: Camden Council Planning Policy

Date: 27 June 2025

From: The Residents of Constable House, Adelaide Rd NW3 3QA

Subject: Petition with Consultation Statement with Residents' Comments

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

Dear Rebecca Burden,

Please find enclosed our Consultation Representation that includes:

- 1) A Consultation Statement with Residents' Comments
- 2) A Petition

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Please note: In addition to signing the petition many of the residents will also be submitting their own consultation representations to the Planning Policy Department.

Ms Burden, thank you for accepting Constable House's Petition and the accompanying Residents' Comments and Consultation Statement document.

We look forward to hearing the results/analysis of this consultation and the inspectors' remarks/decisions when they are complete.

Yours sincerely,

Kim Jacobson

To: Camden Council Planning Policy

Date: 27 June, 2025

From: [REDACTED]

Subject: Local Plan Allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please find enclosed a Consultation Statement that includes Residents' Comments and a Petition relating to the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road, for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

We ask that this petition, signed by [REDACTED] - including leaseholders and tenants - be accepted as part of the Regulation 19 consultation, June 2025.

Consultation Statement: Camden Council is proposing to "allocate" an existing area that belongs to the Constable House Estate to be used for Gypsy and Traveller accommodation.

Gypsy/Traveller Requirements:

According to Camden Council's Local Plan, the "allocated" area needs to accommodate 2 Gypsy and Traveller pitches. 1 pitch holds a household, providing space for one static caravan, cars and outdoor living and social space that are 'culturally suitable'. The size requirement of the area needs to be a minimum of 150sq m. The area needs to be able to supply essential services such as sewage, water and electricity and access for traveller, emergency and council vehicles. The "allocated" area needs to provide a physical environment that sustains health and safety (ie. noise and air pollution and free from flooding/water damage). The area must provide privacy for the travellers: the site must not be overlooked by neighbours' in the surrounding residential buildings, nor be exposed to pedestrians and vehicles on the adjacent streets.

The "Allocated Site" and Residents' Comment:

- The proposed area of "allocation" is on the East side of the Constable House Estate.
- The " allocated" area is an enclosed hardstanding recreation and play area.
- The Constable House Estate is comprised of a residential block that houses 63 flats, a car park, an enclosed hardstanding play area, residents' sheds, a separate out building and a play area for young children.
- The " allocated" area is located on the corner of Eton College Road and Adelaide Road.

Residents' Comments:

The selection of this particular site is not justified nor is any information nor evidence given that explains why it was chosen.

This is a densely built residential area. The intersection of streets/pavements is heavy with pedestrian, bicycle, e-scooters/e-bicycles and vehicular traffic. Adelaide is a major East- West road in NW London buses, lorries and cars making it a very high and loud traffic zone. There are major car

parking issues/problems for local residents exacerbated by Round House events and Camden Lock/Camden Town tourists. The density of the area is inappropriate for Gypsy and Travellers' requirements for access to the site and their own vehicles etc.

- The "allocated" area is an enclosed hardstanding recreation and play area; a safe and secure designated amenity space for use by Constable House residents; families and adults and children.

Residents' Comments:

This is the only safe and secure play area for the growing population of children/teens ranging in age from infants to 18 year olds living in Constable House. Residents would lose the only area that provides this important element of an urban/city life.

Constable House residents want to better develop the area and create in this area a rich and exciting multi use area including an outdoor gym, a kick about space, an outdoor social space with picnic tables and benches, a play area for the younger children away from the fumes of the cars etc in the car park, and perhaps even raised bed flower and vegetable plots.

- The "allocated" area is small; measuring less than the required 150sq.m.

Residents' Comments:

According to an architect's calculation it is 100/120 sq m. And as such it does not fulfill the space requirements for 1/2 pitches. The space is too small to be feasible for the Plan's intentions and the realisation of containing Gypsy pitches and a lifestyle that is 'culturally appropriate'.

- The "allocated" area is fenced in and is bordered by landscaped trees and shrubs and flowers on the north, east, south and west sides. Adjacent to the area on the south side is an open space, a green space that has recently been further developed by KoKo Foundation and Communi Trees in conjunction with the Council. New trees and wildflowers have been planted that compliment the already landscaped frontage of the Estate.

Residents' Comments:

Loss of landscaped garden/nature, reduction of birdlife, reduction of shade provided by the trees. The area is a visual and sound and air pollution buffer for the residents living in the CH flats from both pedestrian and vehicular traffic street. The associated green space provides the local neighbourhood and community with an amenity space. This green space is a very needed green oasis, it is used informally by both local Camden residents and the thousands of Camden tourists who visit the area.

- The "allocated" area is a very restricted and recessed area. The area is adjacent to the Estate's vehicular and pedestrian entrance and driveway and car park. Emergency vehicles and Utility/ Maintenance service vehicles such as binmen have to enter this one way.

Residents' Comments:

The area has a history of flooding and holding water. The drains on the access road/driveway and in the car park back up every rain. This greatly affects the "allocated" area. The area has limited road

access due to it's locked in location and that it's below street level and thus presents serious questions of how access for the Travellers will be implemented. The practical requirements necessary for Camden to achieve its aim of providing a liveable accommodation for the Travellers are inappropriate for this space and require a disproportional amount of infrastructural and structural development and financial investment.

- The location and configuration/ footprint of the "allocated" area is directly overlooked and in close proximity to several residential buildings: Constable House is only about 3m away and is 4 storeys; The Etons, a huge block of 6 storeys is directly across the street, Bridge House a 7 storey block of flats is diagonally across the street; directly across Adelaide Rd on Bridge Approach and Adelaide Rd there are multi flat houses and small blocks of flats; and all along Eton College Rd and Provost Rd is a dense community of single family, detached houses and blocks of flats. And construction just began directly across the street, next to the Etons/over the Chalk Farm Tube station of a huge hotel and apartment complex with shops.

Residents' Comments:

The site is completely overlooked and would not provide any privacy for a Traveller accommodation. This lack of privacy and being immersed in such a densely populated area is not compatible with the Traveller lifestyle nor needs.

Health and Safety

Residents Comments:

The "allocated" area is close to the tube and main line passenger and freight railway lines and vibration and noise is a big problem for CH residents. Travellers' pitches would be constantly feeling the vibration and be exposed to loud unfiltered noise from the trains. The East side of the Constable House building has severe subsidence; this will greatly affect developing the Travellers' pitch as any serious construction required for structural changes of the site may severely damage the CH building.

Outcome and Constable House Residents' Conclusion:

The outcome of this direct, in person consultation process with Constable House residents is that 100% of the people I spoke with Disagree with the Allocation of Site C27 and want the Allocation removed from the Local Plan list. The consensus is that CH residents think the Allocation of Site C27 is not feasible, it is unsuitable, and it is not appropriate for the provision of Gypsy and Traveller accommodation.

To: Camden Council Planning Policy

Date: 27 June, 2025

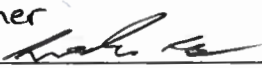
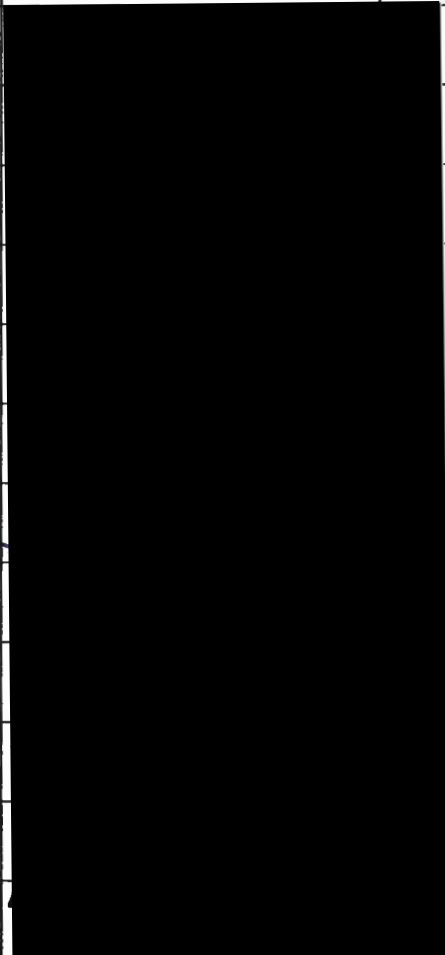







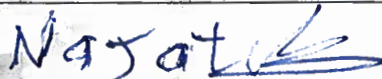
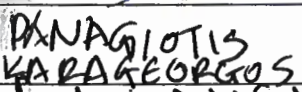
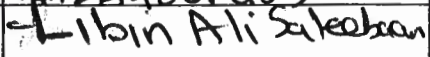
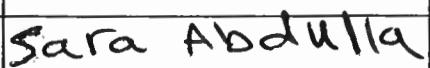
Subject: Local Plan Allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please accept the attached Petition that has been collected from Residents living on Adelaide Road, relating to the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road, for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

I agree with the Proposed Allocation of Site C27.

I disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list.

We the undersigned agree/disagree with the allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please complete each row in full in BLOCK CAPITALS (individuals signing this petition must be persons living, working or studying in the London Borough of Camden)				
	FULL NAME / SIGNATURE	ADDRESS	AGREE	DISAGREE
1	Esther 			X
2	Nadim Rahman 			X
3	HANIFA KHATUN 			X
5	RAZIA  SULTANA			X
6	SISTAR HENRIKE 			✓
7	Leana Matičević 			X
8	Donaton 			X
9	Nakshic Hattini 			X
10	Najat 			X
11	PNAGIOTIS KARAGEORGOS 			X
12	Libin Ali Sulekhan 			X
13	Sara Abdulla 			X

I agree with the Proposed Allocation of Site C27.

I disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list.

We the undersigned agree/disagree with the allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please complete each row in full in BLOCK CAPITALS
(individuals signing this petition must be persons living, working or studying in the London Borough of Camden)

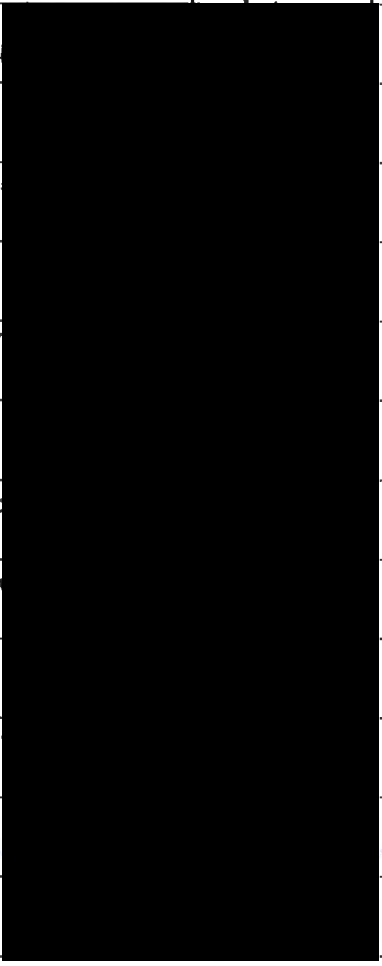
	FULL NAME / SIGNATURE	ADDRESS	AGREE	DISAGREE
14	ANGELA JENSEN			✓
15	OSCAR MARTYANOV			✓
16	P. Q. R.			✓
17	C. B. R.			✓
18	Mia Schwarz			✓
19	W. B. R.			✓
20	B. R. M.			✓
21	TIMEA VIRAG			✓
22	BERAT SINANI			✓
23	BESA SADIKU SINANI			✓
24	AUSA SINANI			✓
25	Lim Cong			✓

✓ This petition documents the response of residents when asked if they agree or disagree that these ~~are~~ "allocated" areas - proposed by Camden Council's Local Plan - are feasible, suitable and appropriate for the provision of Gypsy and Traveller accommodation.

I agree with the Proposed Allocation of Site C27.

I disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list.

We the undersigned agree/disagree with the allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please complete each row in full in BLOCK CAPITALS (individuals signing this petition must be persons living, working or studying in the London Borough of Camden)				
	FULL NAME / SIGNATURE	ADDRESS	AGREE	DISAGREE
26	SAMIRA HUSSEIN			✓
27	ARBAZ SHABANI			✓
28	PRANVEER SHABANI			✓
29	GEORGIA NEVILLE			✓
30	JAMES RAHOS			✓
31	ADAM EBRAHEAM			✓
32	STAFF ATTHUR-PO			✓
33	KOMI OPALEKE			✓
34	A. OPALEKE			
35	FERNANDO DA CARMONA			X
36	VINCENT COUSIN			X
37	Ashley Clish			✓

This petition documents the response of residents when asked if they agree or disagree that these ~~are~~ "allocated" areas/- proposed by Camden Council's Local Plan - are feasible, suitable and appropriate for the provision of Gypsy and Traveller accommodation.

I agree with the Proposed Allocation of Site C27.

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We the undersigned agree/disagree with the allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please complete each row in full in BLOCK CAPITALS (individuals signing this petition must be persons living, working or studying in the London Borough of Camden)				
	FULL NAME / SIGNATURE	ADDRESS	AGREE	DISAGREE
38	MISS VICTORIA ARTHUR			✓
39	Hasan Shaka			✓
40	Fate Garhen			✓
41	Muhamet Sholea			✓
42	Michelle Blick			✓
43	Abdul Zaman			✓
44	Samina Zaman			✓
45	Ahmed Umar			✓
46	Meriamale			✓
47	ROBERT KENN			✓
48	MARIHA JREW			✓
49	EAMON HAUGHEY			✓

I agree with the Proposed Allocation of Site C27.

I disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list.

We the undersigned agree/disagree with the allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).


Please complete each row in full in BLOCK CAPITALS
(individuals signing this petition must be persons living, working or studying in the London Borough of Camden)

	FULL NAME / SIGNATURE	ADDRESS	AGREE	DISAGREE
50	Haeyoung Gu			✓
51	Seungdo Kang			✓
52	Stephen Ak-chark			✓
53	Dorothy Kisubi			✓
54	Zafiro Chetgo			✓
55	Frederick Canuello			✓
56	Le Newton			✓
57	Agart			✓
58	John Macmillan			✓
59	Jim Jones			✓
60	Shi Fei Chowdhury			✓
61	Leigh Wallett			✓

I agree with the Proposed Allocation of Site C27.

I disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list.

We the undersigned agree/disagree with the allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please complete each row in full in BLOCK CAPITALS (individuals signing this petition must be persons living, working or studying in the London Borough of Camden)				
	FULL NAME / SIGNATURE	ADDRESS	AGREE	DISAGREE
62	Alvin Oliver			
63	Salon basnel			
64	Bishesh Khatri			
65	A L SAAD			
66	Raya SAAD			
67	Rukije Shaka			
68	Kandi Lynch			
69	Myethel Dagge			
70	Oliver Speight			
71	Vieran Lunt			
72	Errolm Ferhatoglu			
73	RHONA CARMONA			

I agree with the Proposed Allocation of Site C27.

I disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list.

We the undersigned agree/disagree with the allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

Please complete each row in full in BLOCK CAPITALS
(individuals signing this petition must be persons living, working or studying in the London Borough of Camden)

	FULL NAME / SIGNATURE	ADDRESS	AGREE	DISAGREE
	RENATA MENDONCA GRABOWSKY NUNES			
	JOÃO VICTOR BRITO BORGES			
	MICHAEL F. FRIESS			
	ADAM ROSENBAUM			
	AMY ROSENBAUM			
	NEGLEEN ARASTEH			
	Matilde Rivas Perez			
	NURUL AMIN			

I disagree with the Proposed Allocation of Site C27 and want the Allocation removed from the list.

[illegible]

Date: Wed, 02 Jul 2025 06:09:09 +0000
From: Valerian Freyberg
To: Daniel Pope
Subject: Concerns about Proposed Relocation of Regis Road Recycling Centre

Dear Mr Pope,

I am writing to express concern about the proposed relocation of the Regis Road Recycling Centre to the car park beside the Police Station on Holmes Road, as indicated in the adopted Regis Road Area Guidance.

Many local residents were unaware of this proposal until very recently and feel that it was not clearly flagged during the earlier public consultation. The site lies directly opposite St Patrick's Primary School and close to family homes, raising understandable concerns about increased traffic, noise and air pollution.

This sits uneasily with Camden's Healthy School Streets policy, which has been welcomed and supported locally.

We appreciate that the formal consultation has now closed, but welcome your confirmation (as seen via <https://www.inkermanresidents.org.uk/>) that late representations will be accepted until Friday 11 July. We also welcome the helpful follow-up from Yoo Capital will shortly be launching the next stage of public consultation in July.

In the meantime, I have shared details of the proposal with the Chair of the Bartholomew Area Residents Association (BARA), for wider circulation BARA's catchment includes the southern half of the Bartholomew Estate Conservation Area, covering Patshull Road, Patshull Place, Bartholomew Road (in part), Bartholomew Villas, Lawford Road and Sandal Road, where there is also strong interest in how this proposal might affect the wider neighbourhood.

We would be grateful if the Council could consider how further engagement can be strengthened going forward, and whether alternative locations within the Regis Road area might better align with local priorities.

Thank you for your time and consideration.

Best wishes,

Valerian

To: Camden Council Planning Policy Team

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

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

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden’s

2021 surface water flood data as subject to risk. Traveller pitches are considered a “Highly Vulnerable Use” under Planning Practice Guidance (PPG).

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Conclusion and Requested Action

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

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

Kind regards,

Helen Hart

Date: Thu, 03 Jul 2025 19:51:19 +0100
From: alan fox
To: [redacted], [redacted]
Subject: Regis Road recycling centre

Its not clear how Camden residents can object/comment on this.

May I add my objection to the move?

At present the site is well located in an industrial estate where noise , pollution and frequent HGV traffic cause minimal disruption to residents.

The prosed site adjacent schools are residential housing is totally inappropriate , even if "access" is via Regis Road.

The site should remain in its current location.

It is so typical of Camden to push through these horrendous schemes with little or no consultation , and even when some "consultation" is undertaken , we all know that the planners will just go ahead with their pet scheme irrespective of all objections :

If there is some formal planning notice I should comment on via the usual planning portal, please give me its reference number.

Alan Fox

[redacted address] [redacted postcode]

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Camden Local Plan – Proposed Submission Draft 2025
Representation Form

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

E-mail: planningpolicy@camden.gov.uk
Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –
Part A – Personal Details (You need only submit **one** copy of Part A)
Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

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

Part A – Submit only one copy of this

1. Personal Details*		2. Agent's Details (if applicable)
<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"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gordon"/>
Last Name	<input type="text"/>	<input type="text" value="Curtis"/>
Job Title (where relevant)	<input type="text"/>	<div></div>
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: The Heath & Hampstead Society

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

Documents can be found at the following links:

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

Paragraph

Policy

Policies Map

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

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

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

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

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

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

The Heath & Hampstead Society are very supportive of the objective to restrict all basements construction to underneath the existing building.

however, the wording in clause C 3) and clause 12.131 are not sufficiently clear.

We suggest that the use of the word *footprint* is not sufficiently precise and could be taken to mean an area anywhere on the site not exceeding the area of the existing building.

In this case *footprint* should either be defined as only meaning only the area below the existing house, or

changed from footprint to:

`- all basement construction should be restricted to underneath the existing building only.

(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.

We suggest that the use of the word footprint is not sufficiently precise and could be taken to mean an area anywhere on the site not exceeding the area of the existing building.

In this case footprint should either be defined as only meaning only the area below the existing house, or changed from footprint to:

` - all basement construction should be restricted to underneath the existing building only.

Thank you

(Continue on a separate sheet if necessary)

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

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

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

☐

No

☒

Yes

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

we would welcome the opportunity to explain the problems of basement development in Hampstead citing examples of poor design & management

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

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


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

Privacy Notice

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

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

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

11. Signature:		Date:	27-06-2025
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Part B – Please use a separate page for each representation

Heath & Hampstead Society, Planning Sub-Committee

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	12.115- 12.120	Policy	Basements D6	Policies Map	
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	Yes	No	
(2) Sound	Yes	on the whole	No	x
(3) Complies with the Duty to co-operate	Yes	Yes	No	

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

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

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

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

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

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

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

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

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

Policy D6 Basements: Managing basement development 12.115-12.120

Summary

There are several unaddressed issues in this section that we consider not completely sound. Although the following discussion and evidence section is long, we believe simple and effective remedial changes could quickly be made to it, as long as they are also followed by an up-dating of ARUP's 'Camden geological, hydrogeological and hydrological study' 2010 (ARUP 2010)¹.

These concern :

- Lack of a brief description in the CLP or reference in ARUP 2010 to an up-to-date description of Camden's complex geology and up-to-date maps in ARUP 2010.
- Lack of reference to superficial deposits, little to 'Made Ground'; insufficient requirement for these to be considered as
 - capable of carrying groundwater that can undergo significant storm surges, and highly erodible.
 - potentially responsible for causing subsidence and even landslide on slope angles of 4 degrees or more (not just the >8 degrees that relates to clay).
- Likewise, reference to the bands of the London Clay Formation (LCF) or the transition zones between, their varying levels of silt/sand even across a horizontal metre and, importantly, their relevance;
- Insufficient description of the role of groundwater in contributing to groundwater flooding and sewer surcharging '*downstream*' of basement development, or any requirement to limit this when affected.
- Insufficient acknowledgement of other causes of neighbours' building subsidence related to the local hydrogeology's impact on ground pressure changes.
- Requirement that appropriate borehole drilling and tests are used to establish risk. ARUP to describe this, including reference to those that are not.
- It is emphasised that the computational stability analysis methods used must be appropriate for the complexity of the local hydrogeology or where there is potential change in conditions such as during groundwater storm surges. Some Oasys methods for example may not always be appropriate.
- Data entered into such stability analyses must not break the conditions/rules of the method used.

We believe that this would ensure that these factors are addressed by the developers' experts, are more rigorously assessed by Camden's independent expert and can also be flagged up for all Party Wall surveyors. Our past and current experience is that some developers' experts ignore these factors, perhaps not always due to ignorance but because they are not mentioned in the CLP or in the BIA?

Discussion and evidence

As a result of its investigation of garden changes following basement building, we welcome that Camden have included much stronger wording in E8 to reduce these detrimental impacts.

We are also delighted that some major detrimental impacts on gardens by basement development are being addressed. Camden Planners – and, it seems, its independent expert – are normally only aware of fears of damage prior to residential basement planning consent, not necessarily the consequences. We commend Camden for attempting to establish the extent of the problem for neighbours, and to publish it in the 'Basement Evidence Report, 2016' (BER).

Unfortunately, the BER was retrospective, thus after developers and 'householder developers'

¹ <https://www.camden.gov.uk/documents/20142/2247044/GHH+study.pdf/12f5a776-e382-21fe-8dbd-04ea4db575b3>

had sold on, and a number of neighbours reported to us that they only wanted to forget what had happened. It was not sufficiently in parallel with Building Control and with neighbours' Party Wall surveyors or with local groups, who have some experience and understanding of the extent of the problems, and longer-term consequences:

- when a barrier to groundwater is produced or groundwater is diverted to the sewer system.
- on-going ground movement, as ground pressures settle for up to 10 years after (can be up to 20 years for those suffering the effects of landslide).

Impact of out-dated guidance for the Basement Impact Assessment (BIA): Camden's Hydrogeology

In Camden's BER (614 survey responses; **response rate ~7%**) 30% of respondents reported noticing surface water pooling/flooding. 17 comments, some heart-rending, were made about the flooding experience of neighbours due to basement development. 102 respondents (17%) reported damage that could not be repaired by normal decoration, representing damage above Burland Scale category 2 'slight'. Quite rightly the CLP requires evidence that only up to Burland Scale category 1 of damage is achievable in the Basement Impact Assessment (BIA), but this is not the experience of many neighbours. With similar wording in parts of the basement section to that of the previous CLP (2017), we know that unacceptable damage will still occur to some neighbouring buildings.

We consider there is still insufficient understanding of how to tackle this, or sufficient emphasis and change in wording in this section. Principally though, up-dating of the guidance that relates to it is urgently needed.

This lack of informed understanding of the hydrogeology of Camden is also relevant for flood risk (see below and also our comments on Flooding Policy CC10 and chapters 3-6 regarding Allocation Sites' Policies). We believe it is also relevant for a significant incidence of leaking water mains pipes and sewers (Thames Water have been very interested in discussing this with us), and for the frequent appearance of roadway potholes and sink holes.

In 12.116, ARUP 2010 is still required to be used for basement development. It was well written for its time, but the figures used within this document² are inadequate for illustrating the geological and hydrogeological features that have an impact on Camden.

Figure 2: Camden 1:10,560 Geological Map (1920) was removed from the ARUP 2010 on-line document of figures 1-28, this was reinstated, but separately from 'Figures 1-10' and not labelled 'Figure 2' so confusing and is no longer referred to. This was the most useful map for indicating most of the courses of the 'lost rivers' in Camden and their tributaries to assist in understanding of the hydrogeology of Camden. These are still there, including the rivers and their tributaries' sand partings, even if their water was mostly directed into conduits in the 19th century. During storms their tributaries assert their presence, and much water follows the outside of the conduits and sewers that are unable to enter them until much later, eroding ground-based silt and trench fill as it goes.

Figures 3, 4 & 5 inadequately represent Camden's Geology, implying it is mainly built on 'London Clay', with a nod to Bagshot Sands, the Claygate Member and the River Terraces near to the Thames. Rather than 'London Clay', reference should be made to the appropriate band of the 'London Clay Formation', indicating the degree of silt and sand

² Fig 2: <https://www.camden.gov.uk/documents/20142/255300596/arup+Figure+2+-+1920%27s+Geology+Map+rev1.pdf/f6287a6d-7264-f622-14cd-5854e68de756?t=1600951171888>
Figs 1, 3-10 <https://www.camden.gov.uk/documents/20142/255300596/arup+figs+1-10+ex+2.pdf/14194d68-1a6b-1cee-3780-59dc418a39e7?t=1600951212024>
Figs 11-20: <https://www.camden.gov.uk/documents/20142/255300596/arup+figs+11-20.pdf/a7f2085c-e87b-9d4e-af0e-873289b9a43a?t=1600951284810>
Figs 21-28: <https://www.camden.gov.uk/documents/20142/255300596/arup+figs+21-28.pdf/728de95f-c809-90ee-7415-61c87872a08a?t=1600951158898>

partings that band contains but *adequate* local confirmation still requires, as this is hugely variable³. Significantly, there is no mention of the superficial deposits. Useless. The 1:50 000 BGS map 'North London Bedrock and Superficial deposits'⁴ is better.

Figure 8 'Camden Aquifer Designation Map' has been even more unhelpful, indicating that all 'London Clay' would be an 'unproductive stratum of low permeability that has negligible significance for water supply or river base flow'.

We have seen countless times that both developers and Campbell Reith rely on this map for their argument that there is no groundwater likely to be present, and testing across storms not required or enforced despite evidence of past river presence and silt erosion.

Figure 11: 'Watercourses' is an all-London map, pub 1962. Not adequately accurate; Figure 2 more relevant.

Figure 17 shows 'Areas of greatest potential for slope instability' taken from a map on the BGS webpage⁴, however it is impossible to determine whether a particular building, or even road is on this area and many properties have been subject to subsidence and landslide after basement dig-outs. Unfortunately - possibly because landslide reporting is not well known, or to try to prevent 'blight' of such properties/areas - most episodes are not reported to the BGS in our experience, including significant large slips of Camden's own properties.

Most importantly, there is no indication even that there are permeable and erodible superficial deposits, in addition to 'Made Ground', that are laid in a very complex manner over a significant part of Camden contributing to a good deal of the potholes and sinkholes of the roadways, the failure of mains water pipes laid within it and their own permeable and erodible trench material, and to landslides and building subsidence.

These are affected by digging out on even gentle slopes – far less than the 8 degrees of slope for potential slip attributed to clay - particularly when ground movement is encouraged by groundwater passing through or within sand partings in the bedrock soils below and softening the superficial deposits as well as eroding silt during groundwater storm surges or mains water pipe failures.

Groundwater surging during storms can erode considerable amounts of silt from the ground: from the Made Ground, the superficial deposits and the silt and sometimes sand partings from within the clays beneath. The 'Pavarotti in the Park' storm of the night of 30th July 1994 caused 60m³ of silt to be washed from the ground into the open site beneath the cottage neighbouring Air Studios in Lyndhurst Road. This is now documented⁵, and we have already gathered several incidents of building subsidence locally specifically dated to that time.

Camden have to follow the advice of their independent advisor based on this inadequate data when this is pitted against more expert reports. It is neighbours and future owners who have to live with the consequences.

At the very least it would be better to use the more recent (2006) BGS map of bedrock & *superficial deposits*⁴ to illustrate the geology, accompanied by reference to Ellison et al 2004² that relates to this map.

ARUP used the map 'Areas of greatest potential for slope instability'⁴ (incidentally on the same page as the better BGS geology map) to indicate where these areas are in their Figure 17. Unfortunately, this map is not overlain by the roads to indicate how individual buildings might be at risk and so is generally ignored, including by Campbell Reith who are Camden's independent

³ Ellison, R.A., Woods, M.A., Allen, D.J., Forster, A., Pharaoh, T.C., King, C., 2004. Geology of London. Memoir of the BGS. Sheets 256 (North London), 257 (Romford), 270 (South London) and 271 (Dartford) (England and Wales). Can be found at <https://webapps.bgs.ac.uk/Memoirs/docs/B06069.html>

⁴ <https://largeimages.bgs.ac.uk/iip/mapsportal.html?id=1001750>

⁵ <https://camdocs.camden.gov.uk/CMWebDrawer/Record/5606680/file/document?inline>

experts for assessing basement impact assessments. Campbell Reith appear to be unaware of the consequences of such work.

In the Hampstead Neighbourhood Plan (HNP) revision 2025⁶, we have ensured that rather than referring to ARUP's Figure 17 we have overlain a map of part of the BGS map of bedrock & superficial deposits² for our area - which also includes the roads from an Ordnance Survey map - with the map of 'Areas of greatest potential for slope instability' on the same webpage and included this in the HNP (see map at end). Camden can be commended for passing this, along with the government examiner so that it is about to be published.

Land stability - 12.119 This section is no stronger than the CLP, 2017 regarding land stability. It is still backed-up by ARUP 2010 section '2.7 Slope stability' that only refers to clay and not to the superficial quaternary deposits.

Since Weeks paper of 1969⁷, landslide has been reported on London Clay Formation slopes at angles of 4 degrees or less where related to superficial quaternary deposits such as the Head here. In Hampstead, we are assessing the full extent of landslides, finding 8 major landslips prompted by basement digging out along the north side of Finchley Road alone, and of building subsidence also timed with basement digging out or with storm surges of groundwater (ongoing study but already with a huge number of results). We are planning an X-band InSAR survey of 5 square kilometres of our area to establish the twice-daily historical ground movement over 10 years at 3x3m surface intervals with a resolution of vertical movement down to 1-3 mm in conjunction with University College London. This will allow better understanding of the many causes of ground movement, with timing helping to indicate causes at a particular site.

It is necessary to define the sort of analyses that is to be used, so that it presumes homogeneous and isotropic conditions but the BH data with depth is layered and/or complex, a 'mishmash', that can be challenged.

The Oasys⁸ analyses for example are not dynamic. They don't cater for vibrations from construction, landslides that are creeping as a result of excavation and consolidation from the reduction of pore water pressures. It may be assumed that conditions are reasonable BEFORE excavation commences but they can become changed with time to conditions that would not produce predictions of displacements that are acceptable.

The Oasys analyses are based on empiricism; they are constrained by settlement curves and ground reactions that have been determined from site experience. Thus, the site being analysed should be identical, or at least significantly similar, to that from which the empirical data constraining the analyses has come from. A frequently used version is that derived from data at a site in Pont Street, Kensington. While the ground here is 'London Clay', it is essentially of level rather than and completely different to the London clays encountered in north or south Camden. Camden's BER and our experience shows that a significant number of Camden sites, originally indicated as Grade 1 on the Burland Scale in fact suffered damage of over Burland Grade 2. The contractor may be blamed, but that's the fact of the ground conditions. Oasys cannot cope with dynamic conditions and so represents ideal circumstances which the BRE and our empirical data shows does not exist in many cases.

Camden's protocol should require a clear demonstration for non-technical readers of how input

⁶ <https://www.camden.gov.uk/documents/d/guest/1-hampstead-neighbourhood-plan-2025-2040-lowres> This is Map 8: Hampstead landslide potential on page 47 HNP. N.B. Due to error, this is currently the wrong map, but the revised map (see 'Final map for HNP, 2025' at the end) has been passed by the Examiner and will go into the final version.

⁷ Weeks, AG (1969) 'The stability of natural slopes in south-east England as affected by periglacial activity'. *Quarterly Journal of Engineering Geology* 2, 49-61.

⁸ <https://www.oasys-software.com/>

data has been calculated and used in a computational stability analysis, i.e. a vertical profile of appropriate strength values from which input data is derived.

The CLP need to emphasise the importance of understanding a site's geology, including the superficial deposits, and hydrology, its erodibility, ability to carry water and the impact it will have on ground movement and flooding; not only on immediate neighbours but also on those downhill and downstream. Once this has been achieved through appropriate testing across adequately severe storms, the methods used to assess risk of damage need to have their requirements followed. For example the Oasys group of stability computations is often used without concern for their requirements for a stable site, either by the experts used or by Camden's independent expert who should be checking this. When a site is on a known area of high and very high risk of landslide, when the complex and erodible superficial deposits are ignored or not noticed, the relevance and history of the local hydrology is not understood, particularly of groundwater storm surges, then the ground cannot be said with certainty that it is stable. Hence, it should be considered if Oasys-type methods should be used here.

We also see the wrong method of drilling and sample recovery used when testing for groundwater allowing the natural barriers between the layers to be disrupted so that it becomes impossible to determine the depth at which groundwater occurs – either constantly or during storm surges - and can have an impact or be impacted upon. We frequently see disturbed soil samples used where undisturbed samples are required for certain tests. This has sometimes been picked up at review, but not always.

Too frequently we see the wrong data for soil type entered into Oasys calculations based on assumptions e.g. that virtually everywhere is 'London clay' hence uniform, 'unproductive', and that soil stiffness is graded with depth and with uniformity. If only that were so. This means that degrees of damage are often underestimated, but it is rare to see this picked up.

We are also planning to do a historical X-band InSAR⁹ survey of 5k² of the Hampstead area, so that vertical ground movement at 1 metre intervals over a decade can be measured with millimetre accuracy. This would establish where the problem areas for us are much more accurately, as well as help in determining the causes of building movement.

InSAR at this level of details is much more accurate than the freely available Copernicus¹⁰. We consider this also needs to be extended for all of Camden.

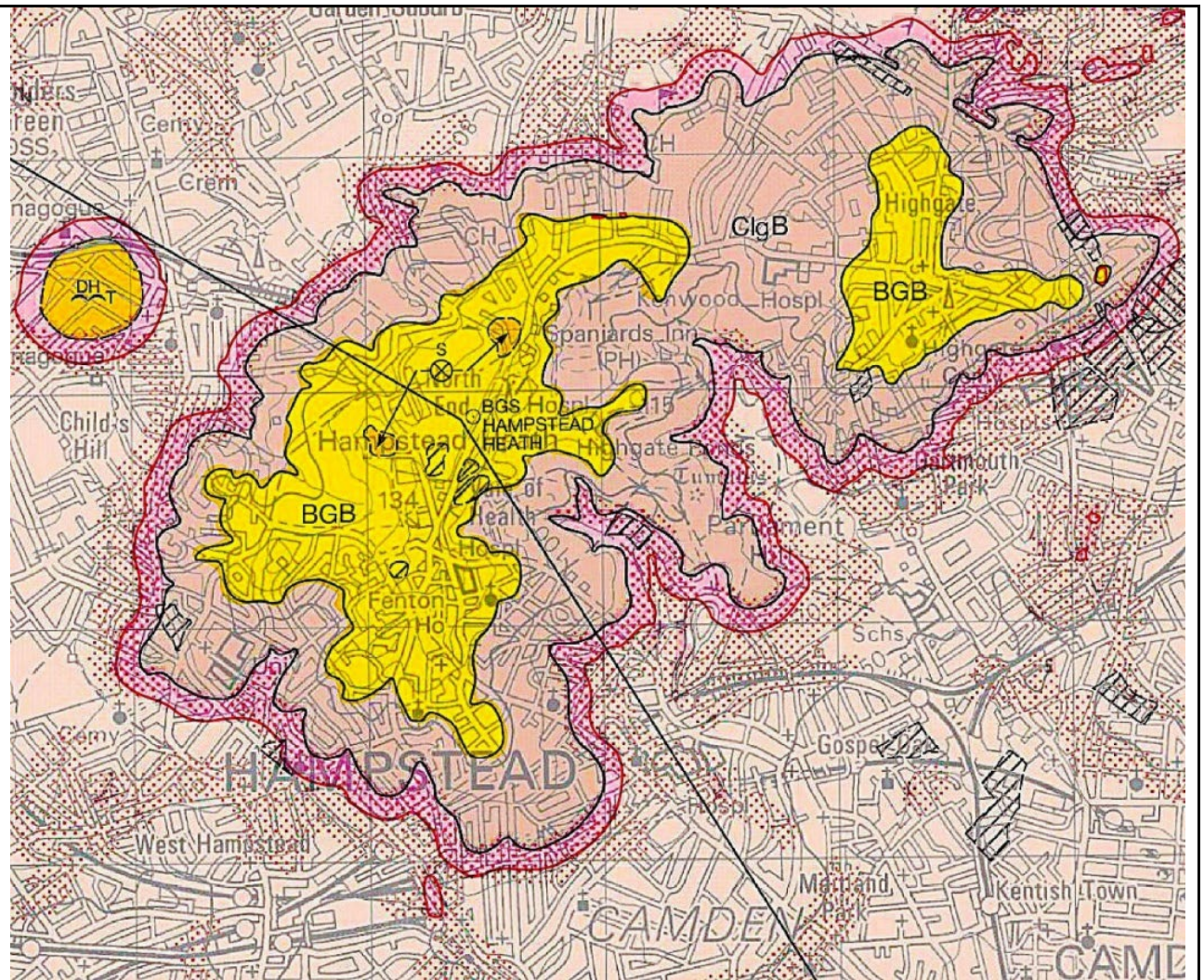
Conclusion

We believe that some simple adjustments to the wording in the CLP regarding basements (provided the ARUP 2010 document is going to be revised and up-dated) would produce a large difference in outcomes for basement development neighbours. This would also back-up the requirements for action on flooding in Camden's Level 1 Strategic Flood Risk Assessment.

An up-dating of the ARUP study can surely be done subsequent to the publication of the final version of the new CLP to allow it to go through sooner.

⁹ https://en.wikipedia.org/wiki/Interferometric_synthetic-aperture_radar#Terrestrial_or_ground-based

¹⁰ <https://land.copernicus.eu/en/products/european-ground-motion-service>



Final Map 8 for HNP, 2025

Key to Map 8: Hampstead landslide potential

	Head propensity
	High or very high risk of landslide
	Bagshot Sands
	Claygate Beds
	Band D, London Clay Formation

Hampstead's 'Areas of Landslide Potential' and the permeable superficial deposits that lie over the area's bedrock geology.

The triad of superficial deposits / slope / groundwater make ground pressure changes from digging potentially very dangerous for landslide.

Source: British Geological Survey, North London: Bedrock & Superficial deposits.

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

☐ No

☒ Yes

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

I consider I need to attend to help explain the evidence behind our submission, where I hope I am able to.

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

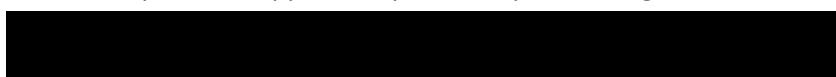
We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed 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:	27th June 2025
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This response is supported by the Hampstead Neighbourhood Forum



Part B – Please use a separate page for each representation

Heath & Hampstead Society, Planning Sub-Committee

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

Basements D6 Policy E 3

Policies Map

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

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

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

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

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

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

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

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

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

Managing basement development 12.115-12.120

We really welcome the new addition of E3, that requires consideration and calculation of the embodied carbon associated with all basement development:

- E3. ..proposals for basements have sought to reduce the embodied carbon of the basement. The Council will request the applicant to provide data showing the upfront embodied carbon of the basement proposal

We have concerns though that this may not be sufficiently enforceable, as it is worded, so that a real reduction in embodied carbon is achieved.

(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.

E3. ..proposals for basements have sought to reduce the embodied carbon of the basement. The Council will request the applicant to provide data showing the upfront embodied carbon of the basement proposal and provide details of all proposals for reducing the embodied carbon of the basement.

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

Privacy Notice

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

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

11. Signature:		Date:	27 th June 2025
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Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Heath & Hampstead Society, Planning Sub-Committee

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

CC10 Flood Risk;
CC11 Sustainable Drainage

Policies Map

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

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

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

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

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

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

*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.

We highly commend Camden for its CC11 policies, aiming to reduce surface run-off by limiting impermeable surfaces and applying a sustainable approach to drainage.

(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.

We consider that there are aspects of CC10 Flood Risk (consequently D6 Basements) that are not sufficiently supporting flood risk in Camden, and that it omits the requirement in the NPPF to ensure that flood risk is not increased *elsewhere*.

This may be at a 'too late' stage in the consultation however, due to the risks involved - that are only going to increase with escalation of the Climate Emergency - we wish to have our proposal for one extra policy and guideline included. These can be found at the end of this Box 7.

The CLP will not be reviewed for another 15 years by which time it is predicted that Climate Change will have considerably intensified. Naturally this could include worsening flooding so in view of the severity of the risks involved from local experience, we believe this is urgent and worth considering at this late stage.

Background and Evidence

Flooding in Britain that occurs on the coast and river flood plains is rightly being taken very seriously. City flooding however has received less publicity, and many are less aware of its impact. Camden is unlikely to be affected very much by flooding of the river Thames, however significant flooding still occurs near the highest points as well as the lowest points of Camden.

All of us are in a river catchment area so that our rainwater, sewer water and groundwater all flow 'downstream'. This has caused extreme amounts of damage to property and in some areas, particularly Belsize Road NW6, there have been deaths and near deaths as a result of surcharging sewers and excessive surface run-off during storms:

During the 14th August 1975 floods¹¹ it has been estimated that as much as 200mm of rain or more may have fallen in 95 minutes (hail blocked the gauge which stopped at 170.8mm / 6.72 inches): the single greatest inundation over such a short period since records began. On this day, an 80-year old gentleman drowned in his Belsize Road basement¹². This has been recently reported to us by his neighbour at that time as occurring when the gentleman returned to his flat despite the initial flooding for some belongings.

In the 2002 floods, an 80-year old woman was washed off her feet in her Belsize Road basement, dislocated her hip and was submerged by water from surcharging sewers and floodwater breaking and bursting through her bedroom window (she managed to crawl onto her upturned sofa and was dragged out by a neighbour to where help could be found, though died 10 days later in hospital from the resulting pneumonia).¹³

An email from a local resident in his 80s told us: "My next-door neighbour who is also in his 80s and lives alone, nearly drowned in the 2021 flood, as water rose to over 5 feet in his flat (I have a picture of the water mark) and he was trapped. Luckily his upstairs neighbours were around, realised what was happening and rescued him."

Many others had to move out of their homes, lost many of their belongings and were not back for long periods during cleaning, repairs and redecoration. Several have had to do this four times in recent years.

As part of our evidence to Thames Water and Camden about what has happened in the 2021 floods, comments were gathered from South Hampstead residents, the recipients of Hampstead's surface run-off, groundwater and sewer water. One resident told us: "I live (lived!) in a garden flat on Belsize Road. Our flat was very badly damaged because we live opposite the manhole cover that exploded so experienced the full force of gushing water. The insurance loss adjuster said it was the worst flood damage he's seen in his career. We lost most of our possessions and are still waiting to have the flat repaired (the force of the water knocked a hole through one of the internal walls). I am sure we're not the only ones who get a knot in the pit of their stomach every time we have heavy rain."

12.115 of the CLP states that it is important that basements do not cause drainage or flooding problems. The NPPF (December 2024) still requires (as it has done since it first came out in 2012) that development should not increase flood risk *elsewhere*, and, where possible, *reduce flood risk overall*, but this is not being required/enforced. We consider that it does not include all the areas that impact on flooding or, could be involved in mitigating for the impact of flooding in the CLP (2025). Fundamentally, we consider that this

¹¹ <https://www.redfrogforum.org/wp-content/uploads/2019/11/87-UCL-The-Hampstead-Storm-August-1974.pdf> and <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/library-and-archive/library/publications/historical-weather-factsheets/hampsteadstorm14august1975.pdf>

¹² Noted in the nationally-respected meteorologist Philip Eden's book 'Great British Weather Disasters' publ Continuum, 2008.

¹³ https://assets.publishing.service.gov.uk/media/602a8e2ae90e07055b9d3240/Flood_Risks_to_People_Phase_1_technical_report.pdf

should be all of us. Thus, one key opportunity is for the NPPF with regards to the impact on flood risk elsewhere to be applied to planning policies for all areas involving all sites in reducing surface run-off, systematically gathering data on groundwater flooding incidents, and in holding back and slowing all water through the riparian and sewer systems at every opportunity as a requirement during planning processes.

Surface Water run-off

Camden and Thames Water are working with the local Flood Action Groups to make residents safer, improve services, liaise with insurance companies and increase local SUDs to South Hampstead. This does not impact hugely though on the quantity of water that descends from Hampstead 'upstream' and joins much other rainwater flowing down to South Hampstead¹⁴, that is only going to increase. Due to its geology Hampstead is the source of 4 of London's rivers, but – like other areas of London - has also undergone significant building footprint expansion, paving over of front gardens, and tree & greenery loss in rear gardens, sometimes with the replacement of real grass with plastic grass. We highly commend Camden for its new CC11 policies, though consider greenfield run-off rates should apply to *all* planning applications. We request that this be extended to all developments and not just those of 'major developments, basement development, and other flood-vulnerable development (such as homes, health services, residential institutions and education) in areas identified at risk of flooding' (CC11 para 8.158).

The Camden's Strategic Flood Risk Assessment Policy 2024 (CSFRAP) in its section 5.2 on surface water flooding summarises well how '...developments in the upstream area of the Counters Creek Catchment ... affect areas downstream in the catchment'. We believe though that the geology and topography associated with the rivers Tyburn and Westbourne as well as the river Fleet (5.2.4) contribute to surface run-off to most of all the flood zones situated in Camden and to those beyond in Westminster, Chelsea & Kensington, City of London and Hammersmith & Fulham. We therefore believe that *all of us at every opportunity* from north to south Camden (and the rest of London, though this is outside the scope of the CLP!) should be working hard to limit and reduce all impermeable surfaces, and provide storm water attenuation temporary storage measures where possible to assist with the likely increase in rainfall and flooding incidents in the future, as well as store water below ground and in the deep aquifers for future droughts rather than building more reservoirs.

Groundwater

We fully support the statement by the CSFRAP that

'areas underlain by permeable geology may be more susceptible to flooding from groundwater sources due to the capacity for groundwater storage and conveyance. This includes areas north and south of the Borough. Historic records indicate groundwater flooding occurred in 2012-2013. *It is possible that other incidents of groundwater flooding have occurred, yet there is limited recorded information to confirm this.*'

CSFRAP 5.3.5 gives a good description of the more permeable bedrock in north Camden and more superficial aquifer here. However, as with Policy D6 in the LCP concerning Basements it fails to note the impact of

- the transition zones immediately beyond the upper bands of the London Clay Formation
- the Superficial Deposits which are also a highly erodible aquifer over a larger area of Camden, and
- Made Ground which acts as a thick, very superficial potential aquifer over virtually all of Camden (please see our comments and evidence on this: D6 Basements 12.115-12.120).

Lack of knowledge about groundwater is affected by the fact that incidents of groundwater flooding are not being collected systematically. The British Geological Survey has only had a very few cases submitted to them, despite the many occurrences in the last few years. There are countless pumps installed beneath Hampstead buildings due to the presence of groundwater, and wells still exist where water can be seen rapidly flowing across the bottom (we can provide video evidence of this), even during drought. Where this water has been tapped by basement digging in the past (as unexpectedly happened to 22 Christchurch Hill in 2008), it has resulted in significant damage, but this huge quantity of groundwater has also been diverted directly into the sewer system.

Whenever groundwater is diverted to the surface or into sewers, the impact immediately extends to all flood zones downstream, adding to sewer surcharging, even a significant distance downstream. Diversion of groundwater/groundwater storm surges can be done by basement developments.

All removal of Superficial Deposits and Made Ground soil for basements and foundations of *any* new-build

¹⁴ https://x.com/alvarogafu/status/1414618450136387584?s=58&t=r9T11frNs-eA7mxWsV_EJw

or extensions reduce the 'sponge' that slows the passage of water to the sewer system. All of this impacts on anything downstream in the river or sewer catchment area.

Data on Susceptibility to Groundwater Flooding, and areas underlain by 'lost' rivers should also be considered, to identify locations where basement structures are likely to affect groundwater flows through diversion and changes to the water table.

Camden is also urged to encourage the British Geological Survey to gather this data, and Building Control to ensure it is always captured and reported, though it is acknowledged this is outside the scope of CLP review.

Most CLP sections on flooding are concerned with reducing risk to the site, some consider the neighbours, but there is almost no consideration of the groundwater sent more directly and faster to the sewers adding to the risks of sewer surcharging that can occur during storms. Developers are merely required to ask for permission from Thames Water to send their groundwater to the sewers. We are not aware of any refusals and can presume that they are too rarely given.

Allocation Site reports

We note that many of the Allocation Site reports in chapters 3-5 state they are within the Secondary A Aquifer. Concerns are expressed about foundation works extending 20m+ below ground surface: a risk they will extend through the London Clay and affect the groundwater in sensitive aquifers. This rightly considers risks/effects *on* groundwater, but there is no indication that groundwater can provide a risk to a development *or to others*.

Silt blockage of sewers

Camden has a particular problem of adding to city flooding not only due to surface run-off, and not only due to the diversion of groundwater straight to the sewers by basement development whenever groundwater is encountered. Silt blockage of sewers is now recognised as the main problem for the South End Flood Zone thanks to investigation by the South End Action Group who are working closely with Camden and the Corporation of London to solve this problem.

To a probably lesser extent, silt is still also a problem for all of Camden's sewers, and future preventive as well as silt-removal measures need to be planned for and implemented. Further relevant details about groundwater and Camden's geology, including the silt in the superficial deposits, can be found in our Response Form for Basements Policy D6 paras 12.115-12.120.

Additional Points

- Footnote 63 of the NPPF also clarifies that in Flood Zone 1, an assessment should accompany *all* [our italics] major sites (involving 1 hectare or more) for land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

In Camden, where the geology is complex for a large range of reasons, it seems that developers' experts are not always aware of potential vulnerability. We believe that variation in local geological conditions mean that *all* such major sites throughout Camden should require an assessment to search for vulnerable sites prior to planning permission and certainly prior to first breaking ground.

If Camden or the Inspector requires further evidence that this is so, they are requested to ask us to point to these so that they might be reassured that this is warranted.

- The NPPF's definition of "development" is broad and encompasses any building operations, engineering operations, or material changes in use of land or buildings (see Annex 2: Glossary of the NPPF). This means the CLP policies should not only apply just to new builds or major builds as is frequently implied, but should make it very clear when policies also apply to *all* extensions, basements, and other changes that may affect flood risk. A number of individual residence developers ignore the need to test for local conditions and measures for the whole site to fully mitigate for flooding elsewhere on this basis.

PROPOSED ADDITIONAL POLICY GUIDELINES

We consider that Camden should include the following policies for CC10 requiring that:

- All developments involving significant soil removal or groundwater diversion—including basements and large extensions—should consider incorporating appropriate on-site attenuation measures, such as

Sustainable Drainage Systems (SuDS), to ensure that flood risk is not increased elsewhere in the borough.

- Site-specific Flood Risk Assessments must consider both site-specific and cumulative impacts, and demonstrate how the development will manage surface and groundwater sustainably, fully in-line with the NPPF and the CSFRA.
- Where it is not feasible to achieve greenfield run-off rates through merely improving permeability, applicants must provide robust justification and demonstrate that alternative measures on-site, or off-site by a contribution to public measures to mitigate for storms, will minimise flood risk.

We consider that Camden should include the following policies for CC11 requiring that

- The removal of ground capable of absorbing or facilitating the passage of any groundwater, or
- Diversion of groundwater straight to the sewer system should
 - a) be appropriately tested for its likelihood at the planning stage, including through a period of rainstorm, then
 - b) it be required that any groundwater diversion to the sewer system be fully mitigated for on-site by appropriate storm attenuation

(We also consider that where this occurs, financial support could be given for positive mitigation.)

These requirements would then ensure that the CLP is in line with Paragraph 173 of the National Planning Policy Framework (NPPF), which states: "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment."

These proposals should ensure this is carried out.

(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

Yes

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

I think a local representative of the area who knows about the flooding that occurs and some of the contributors should be present.

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

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

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

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

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

11. Signature:	Dr Vicki Harding	Date:	27 th June 2025
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This response is supported by the South Hampstead Flood Action Group, Chair: [REDACTED]
[REDACTED] who would also be prepared to attend the examination hearings

This response is also supported by the South End Flood Action Group, Chair: [REDACTED]
[REDACTED]

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: Heath & Hampstead Society

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

19

Policy

C1

Policies Map

Also N1 para 7

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.

The Heath & Hampstead Society is pleased to support the plan for a Camden Nature Corridor, which has now been incorporated into the draft Local Plan. The Society has long been committed to keeping Hampstead Heath an open, nature-rich space for all to enjoy. The health benefits of “time in nature” are now recognized, and policies at the national, London and Borough level are seeking to create more accessible nature areas and to join them up to improve nature and its enjoyment.

The Camden Nature Corridor is an imaginative plan to bring more nature from the Heath into nature-deprived urban communities south of the Heath towards Central Camden. It proposed to do this by linking the Heath, central London's biodiversity "hot spot", with smaller Camden Sites of Interest for Nature

Conservation through green infrastructure in the forthcoming Murphy's Yard, Regis Road and West Kentish Town Estate developments. Not only will this bring environmental and health benefits to the estimated 2000+ new households to be built down into Kentish Town, but it will protect five Camden SINC's which could otherwise be badly damaged by development.

New homes, and the Heath Line identified in the draft Local Plan, will bring thousands of new visitors regularly to the Heath. The best way to make sure that the nature they value is there for them to enjoy is to make nature-rich areas more resilient by improving, enlarging and linking them. That is precisely what we believe the Camden Nature Corridor will do. 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)

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

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

☐

No

☐

Yes

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

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

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

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

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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:	17-06-2025
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Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: The Heath & Hampstead Society

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 12.29

Policy D2

Policies Map figure 22

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

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

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

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

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

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="no comment"/>
(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="no comment"/>
(4) Consistent with national policy	<input type="text" value="no comment"/>

*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.

We would begin our representation with reference to planned development of tall buildings at the Bacton Low Rise, Havestock Road. This site is identified in the site allocations and identified on figure 22 as suitable for tall buildings, this zone is not part of the centralised zones and therefore generally subject to a 30 metre height threshold – this equates to a residential building of 9 storeys.

Camden have already partnered with a land developer and are proposing new towers here of up to 24 storey heights. We feel this is too high.

We don't, for a number of reasons, support high rise development outside of Central activities zone for the following reasons

- 1) the embodied carbon associated with high rise buildings is far greater than with low rise, this would seem to compromise policy CC4. Various studies are available to support this claim
- 2) the energy consumption of the higher storeys of high rise residential buildings are known to be far higher than the lower floors, this is due to increased reliance on mechanised means. , this would seem to compromise policy CC4. Various studies are available to support this claim
- 3) The blocking of the skyline view by high rise developments at sites identified in figure 22, namely sites F, G, K L & N would compromise draft local plan policies NE1 particularly sub headings A1, A3 and paragraph 11.17.

The attached diagram illustrates the point



view from Parliament Hill showing the effect of 50 metre (16 storey) height development in designated zones f, g, k, l & n



view from Parliament Hill showing the effect of 25 metre (8 storey height development in designated zones f, g, k, l & n

- 4) Policy NE1 specifically states that the council will 'preserve and enhance Hampstead Heath by taking into account the impact on the Heath when considering relevant planning applications including any impacts on views to and from the Heath. The above photograph clearly shows how anything taller than 9 storeys in sites F, G, K L & N will considerably impact on world famous views.
- 5) Paragraph 11.6 goes on to describe key areas of open land within the borough, Hampstead Heath is one of four particularly important places named, it then states that Camden will protect the openness and character of these spaces.
- 6) Paragraph 11.17 continues to describe Hampstead Heath in detail, in particular its size and accommodation of recreation space (for all Londoners and its visitors). It states that 'We will continue using guidance in conservation area appraisals to preserve and enhance the built environment around the Heath and preserves outlooks and views from it.

We are concerned that the apparent willingness to allow tall buildings in the sites designated F, G, K L & N in the diagram 22 will very much compromise and conflict with the intentions and undertakings in the policies highlighted above.

(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.

We wish that

- a) sensible height limits are established in the plan for all of the designated zones, it is unreasonable to leave these open ended
- b) we wish the height limitation to be set generally at 8 storeys with discretion to be used to permit up to 12 storeys maximum to sites F, G, K L & N.

(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

Yes

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

We feel that we have well informed and reasonable arguments which are for the benefit of all users of Hampstead Heath. This as you will understand, is a very large number of people from all walks of life

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

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


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

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11. Signature:		Date:	27-06-2025
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From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Gypsy site chalk farm
Date: 06 July 2025 11:08:13

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

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

Hello,

I am writing to oppose the gypsy traveller site near Chalk Farm Station. This is too close and will ruin Primrose Hill which is the gem of Camden and should be protected.

I am a resident.

[REDACTED]
Jacqueline Bailey

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 07 July 2025 13:14:25

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

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

To whom it may concern,

I am the owner of a property in the vicinity of the proposed Traveller site at Adelaide Road and wish to express my objection and request the deletion of Site C27 from:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

The reasons for my objection are:

1. Amenity space for the existing local community: There is minimal green space in this densely populated neighbourhood, and local residents need access to it. I am not aware of a provision for additional green space to compensate local residents for this loss of their existing space.

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

3. Playground: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby. As a parent with young children who need access to safe green spaces close to home as an essential aspect of their physical wellbeing, this is of utmost importance.

4. Overlooking: The site is overlooked on all sides and is also a busy road. This is not an appropriate location to house Travellers for their own privacy and wellbeing.

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

6. **No independent access:** this will create serious disruption to residents of Constable House and Eton Place.

7. **Schools:** there appears to be no evidence that consideration has been given to whether there are places available for Travellers children without our local schools.

In light of the guidelines for appropriate locations for Traveller sites, Site C27 is not a suitable location and in fact contravenes those guidelines both in terms of the suitability for Travellers and the impact on the adjacent council tenants. There has also been no consultation with the local community which will inevitably cause tension between existing residents and the Traveller community, who already face discrimination.

For these reasons, I ask you to reconsider and remove Site C27.

Many thanks for your time and consideration.

Mitra Sessions



10

Re: The proposed relocation of Regis Road Recycling Centre and the need for more time to respond.

09 July 2025 21:46:54

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

Dear Dan

Further to our recent exchange of emails, we are writing to confirm IARA's position with regard to the repositioning of the recycling centre on the Regis Road site.

We accept that the Local Plan reflects the earlier indications that the majority of people feel strongly that the recycling centre should be kept on the site, and that there should be continuous provision.

However, as you will have gathered from recent correspondence, there is a general rejection of the proposal to site the centre on the police station car park, close to the homes on Holmes Road and directly opposite the playground of St Patricks Primary School.

We are planning to meet with the Film Quarter people soon to explore alternative sites, and will be in touch directly with them. We hope that we can reach agreement before there is any formal planning application. It would be a pity if this turns into a conflict between the health needs of residents and the school, and the wishes of a developer.

Debby Hyams, Chair. David Jockelson, Secretary.

Inkerman Area Residents Association Limited

Registered in England No. 10075818 Registered Office:

To stop getting emails from IARA, and remove your data from our records, please reply to this email.

From: Daniel Pope

Sent: 26 June 2025 12:22

To:

Subject: RE: The proposed relocation of Regis Road Recycling Centre and the need for more time to respond.

Dear Debby and David

Thank you for your email on this issue

As this is a statutory consultation, it needs to be undertaken in accordance with government legislation. Given this, we are unable to extend the closing date of this consultation, which is the 27 June 2025. However, we are happy to accept a late representation by Friday 11 July

It is important to clarify that the draft Local Plan Policy C2 Regis Rd and Holmes Rd depot sets out a number of development and design principles to guide the future development of this site. This states that:

“Development must 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”.

Therefore, the draft Local Plan does not indicate a preferred location for the recycling centre within Regis Road.

When we consulted on the draft Regis Road Area Guidance one of the main pieces of feedback was that the guidance should emphasise that the recycling centre is to be reprovided and provide details about its proposed location. In response to this the location of the recycling centre within the Regis Road Area has been further emphasised and a potential location is now indicated on the Police Station site on Holmes Road. This is made clear on page 15 of the adopted guidance.

Whilst the guidance indicates the Police Station site as a proposed location for the Recycling Centre the environmental, amenity and health and safety impacts have undergone an initial review and will need to be thoroughly tested and assessed. The new recycling centre would be a modern, enclosed facility and would face and be accessed from Regis Road not Holmes Road. Holmes Road would have a residential frontage. This is consistent with the guidance which makes clear that new development provides an opportunity to improve the quality of buildings and public realm along Holmes Road.

Yoo Capital will be consulting on their proposals next month and that will be an opportunity to provide feedback and to cover your concerns in more detail. Whilst we are happy to meet you before that it might be better to meet with the benefit of their latest proposals given that the draft Local Plan does not indicate a location for the recycling centre.

Regards

Daniel Pope
Chief Planning Officer

Daniel Pope
Chief Planning Officer

Telephone: 020 7974 4620

From: Inkerman Area Residents Association [REDACTED]

Sent: 24 June 2025 10:07

To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: The proposed relocation of Regis Road Recycling Centre and the need for more time to respond.

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

To Camden Council and YOO Capital

Dear Colleagues,

As you will know, the Inkerman Area Residents Association has been recognised for over 40 years by Camden as a representative community organisation for the area of the Inkerman Conservation Area and somewhat wider - including Holmes Rd and up to the railway lines.

We have been made aware recently of the proposal by YOO capital that the recycling centre should be relocated within the Regis Road scheme onto the site which is currently the car park to the west of the police station on Holmes Road.

The reason that we have only recently become aware of that is that there was completely inadequate notification of this proposal. It was in fact buried on pages 46-47 of the final, adopted, Regis Road Guidance Area Supplementary Planning Document dated 10 March 2025.

It was not therefore the subject of any explicit or precise public consultation during the November/December consultation. It is causing huge concern in this area.

There is general support for recycling and *at this time* for the recycling centre to be on the Regis Road area, and this has been the subject of discussions over many months in meetings with Camden and with YOO capital, but the **planned relocation is hugely problematic.**

The current location is in fact fairly embedded in what is a semi industrial area some distance from the conservation area and the residential properties – ie people's homes - and the environmental impact is acceptable.

That environmental impact includes the high level of vehicle traffic by cars and heavy lorries with attendant pollution and the noise associated with the manoeuvring of the enormous metal skips.

For that environmental impact to be brought southwards, effectively right onto Holmes Road and immediately alongside family homes is unacceptable to many residents. In addition the proposed location is directly opposite Saint Patrick's School.

Given the great and commendable initiatives of Camden, which have been fully negotiated, consulted on and supported by residents, to improve the safety and health of Holmes Road as a Healthy School Street, it is completely contrary to that philosophy to have this significant source of pollution moved to this location.

This association comments on all applications on the basis of a democratic mandate from members, usually expressed to our extremely vigorous WhatsApp group of 263 members, many of them representing several individuals in a family.

We have not yet established a complete consensus on all the details of the position that we will be taking, but this email addresses immediately and urgently the fact that we have almost no time in which to develop a democratic, coherent and full position and submit it to the council.

We are therefore asking for an extension of time for consultation – which should have happened explicitly and professionally by Camden and Y00 capital.

Two weeks must be the minimum for this procedure and we would very much want it to include a meeting with Camden and Y00 capital. Therefore we propose strongly that the deadline for responses should be extended to Friday, 11 July.

We are copying in our local councillors, our local MP, Camden New Journal and in due course will circulate this to our 400 online members, in addition to the WhatsApp group.

We look forward to hearing from you before the Friday deadline.

Yours faithfully

Debby Hyams, Chair
David Jockelson, Secretary

Inkerman Area Residents Association.

[Redacted signature]

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: gypsy and traveller site
Date: 15 July 2025 19:16:51

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

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

To whom it may concern,

I am writing to express my concern regarding the proposed development at the land east of Constable House.

To date, I have not received any official communication - neither by email nor post - regarding these plans, which I find completely unacceptable.

It is particularly troubling that essential information affecting Camden residents was only posted on a sign that remained obscured by ongoing roadworks for several weeks. Such a method of communication is wholly inadequate for ensuring local residents are properly informed.

Whether the proposal involves changes to the roads or the construction of gypsy/traveller sites, the local community deserves clear, timely, and accessible updates on any such developments.

I would appreciate it if you could clarify what is being planned for the site and explain why residents have not been adequately informed.

Kind regards,

Mariya Bilyan

[REDACTED]

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Objection to Proposed Gypsy and Traveller Site Allocations in Camden Local Plan
Date: 16 July 2025 21:58:27

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

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

Dear Planning Policy Team,

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

While we recognise the need for inclusivity and housing for all sectors of society, including the Traveller community, we believe that these proposed sites are not suitable for the following reasons:

1. Negative Impact on Residential Amenity

Both sites are located in close proximity to established residential communities. Introducing additional housing on these small parcels of land—particularly the Constable House site, which is extremely limited in space—risks creating issues of:

- Overcrowding,
- Noise pollution,
- Loss of daylight and privacy,
- Reduced air quality, and
- Increased pressure on shared amenities.

2. Littering and Waste Concerns

Existing traveller sites across the UK have, in some cases, led to increased littering and improper waste disposal.

Despite Council management plans, residents are worried about the site being inadequately maintained, affecting cleanliness, hygiene, and attracting vermin.

3. Loss of Potential for Broader Community Benefit

The selected sites could serve better purposes, such as:

- Affordable housing units for families on long waiting lists,
- Community green space,
- Local business support,
- Playgrounds or facilities for young people.

These uses would align more broadly with the needs of the wider local population.

4. Traffic, Parking, and Access Issues

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

5. Site Unsuitability and Space Constraints

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

6. Security and Social Cohesion

Many residents are anxious about potential increases in antisocial behaviour, especially given the close

proximity of the proposed sites to family homes, parks, and schools. Whether justified or not, these concerns significantly affect the sense of safety and cohesion in the community.

7. Negative Impact on Property Values

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

8. Alternative Options Not Fully Explored

The decision to select these two sites appears based on an exclusion process rather than an affirmative demonstration of suitability. From the FAQ document, 16 of the 18 originally identified sites were ruled out. This does not necessarily mean the remaining two are genuinely fit for this specific purpose.

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

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

Thank you for your attention to this matter.

Kind regards,
Brad dryer



Date: Tue, 29 Jul 2025 14:03:47 +0000

From: Camilla Guinness

To: PlanningPolicy

Subject: Kentish Town police site

Dear planning team,

I object to your plans to build a recycling center in Kentish Town, and in particular on the police site.

A recycling centre would be totally inappropriate for the new neighbourhood, and indeed the whole of Kentish Town. It would be much preferable to build more (affordable) housing. There is a recycling centre quite close in Hornsey Street already.

Kind regards

Camilla

Responder 696

To: Camden Council Planning Policy Team

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

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

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

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

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

6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

7. Better Alternatives Exist

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

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

Consistency (application of methodology).

Conclusion and Requested Action

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

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

Claire Connold

Responder 697

To: Camden Council Planning Policy Team

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

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

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

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

2. Overlooking and Loss of Privacy

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

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

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

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

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

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

Regards

Darshak Mehta

Responder 698

To Whom it may concern,

Please find attached our representations for Constable house.

Kind regards

Erika Nilsson and Michael Humphrey

LB Camden: Attachment does not open

Responder 699

I don't think this is a good idea to have a travellers site in this area it's over run with tourists as it is thankyou

Mick

Responder 700

Dear Sir and Madams,

To: Camden Council Planning Policy Team

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

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

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

With this, I urge you all to reconsider the decision.

Best Regards,

Priya Sinha

Registered Office:
Newington House
237 Southwark Bridge Road
London SE1 6NP

Company:
UK Power Networks
(Operations) Limited



Registered in England and Wales No: 3870728

19/09/2025

Dear Andrew Triggs,

Re: Response to Camden's Local Plan Submission Consultation

I am writing to provide our response to Camden's Local Plan submission consultation. We appreciate the opportunity to contribute to the development of the Local Plan and would like to highlight the following key points:

- The Local Area Energy Plan (LAEP) phase 1 outputs for the Central, Inner East and North London (CIENL) subregion, which includes Camden, shaped the UK Power Networks' 2025 Distribution Future Energy Scenarios (DFES). Data sources for the CIENL LAEP phase 1 included site allocations from the London Borough of Camden Local Plan.
- The 2025 DFES predictions were subsequently used to identify future capacity via our 2025 Distribution Network Options Assessment (DNOA).
- In our DNOA process, we identify future capacity needs based on the latest predictions from our DFES. We then source all the viable options to resolve our system needs, compare them and make a recommendation for the optimal solution.
- The 2025 DNOA identified assets within the London Borough of Camden that require intervention ahead of what was expected prior to the CIENL LAEP phase 1 outputs.
- Assessment is annual and we will continue to consider data shared by London Borough of Camden.
- We are aware that London Borough of Camden are undertaking a LAEP phase 2. We will continue our collaboration with them as they advance their LAEP phase 2 to inform our forecasts.
- Through UK Power Networks DFES, we also consider housing projections. This year, in collaboration with local authorities we are evolving, through our LAEP support framework, additional approaches to bring in housing data through the local authorities themselves. This includes Camden.

We look forward to supporting London Borough of Camden and our continuous engagement.

Yours sincerely,

Flora Mavri, Net Zero Associate
UK Power Networks - Distribution System Operator (DSO)