

# London Borough of Camden Gypsy and Traveller Site Identification Study (GTSIS)

Deliverable 3: Final Report

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## Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Stephanie Brewer Associate Director	Ben Castell Director	Una McGaughrin Associate Director	Ben Castell Director

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### Prepared for:

London Borough of Camden Council

### Prepared by:

AECOM Limited  
Aldgate Tower  
2 Leman Street  
London E1 8FA  
United Kingdom  
aecom.com

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# Executive Summary

This Gypsy and Traveller Site Identification Study was commissioned by London Borough of Camden. Its purpose is to inform and support the review of Camden's Local Plan, by identifying a shortlist of Council owned sites which could potentially be allocated to meet the needs of Gypsies and Travellers in the borough, subject to further assessment by the Council.

The Council are currently reviewing the 2017 Camden Local Plan and have published a Regulation 18 draft new Local Plan in January 2024. The draft Local Plan also incorporates the site allocations from the 2020 Draft Site Allocations Local Plan. When adopted, the new Local Plan will supersede the 2017 Local Plan and the 2013 Site Allocations Plan. The Council's most recent assessment of need, completed in 2014, identified a need for 16 additional residential pitches for Gypsies and Travellers to be delivered by 2031. The assessment indicated that there was no requirement for additional transit pitches or additional plots for Travelling Showpeople. An updated assessment of the extent of Gypsy and Traveller accommodation need to be met in the borough will be included in the emerging London Gypsy and Traveller Accommodation Needs Assessment being undertaken by the Mayor, in line with Policy H14 of the London Plan 2021 and the government's Planning Policy for Traveller Sites 2023.

2,821 Council freehold title sites and 243 leasehold title sites were assessed as part of this study. Some of these freehold and leasehold titles overlapped. AECOM undertook sift mapping and a high-level, desk-based assessment of sites owned by the Council, in line with agreed policy criteria and available mapped constraints.

This resulted in an identified shortlist (Appendix C) of 21 Council freehold owned land parcels, forming part of 18 original freehold title sites submitted for assessment. These 21 freehold land parcels are considered potentially available, suitable, and achievable, subject to further assessment by the Council. All other sites were sifted out as either not suitable, available, or achievable. No leasehold sites were shortlisted, although five of the short-listed Camden freehold sites overlap to some extent with a leasehold title. It should be noted that the total number of land parcels identified is greater than the number of title sites submitted for assessment, as some sites were dissected into smaller land parcels by identified constraints, and some overlapped.

As a next step, the Council will undertake further assessment of the shortlisted land parcels, to further refine this shortlist and determine whether they will take any of these parcels forward for allocation in the Local Plan review, weighing up different policy considerations.

All of the shortlisted land parcels identified by AECOM for further assessment have constraints to delivery, some of which are complex and significant. If constraints cannot be resolved or mitigated, or if subsequent detailed assessment identifies further issues, some or all of the land parcels shortlisted may not be appropriate for allocation. The findings of this high-level Gypsy and Traveller Site Identification Study, and of subsequent detailed assessment by the Council, will need to be taken into account in the Strategic Environmental Assessment report to accompany any subsequent consultation on Camden's new Local Plan.

# 1. Introduction

- 1.1 London's Gypsy and Traveller<sup>1</sup> communities have historically experienced overcrowding and other forms of housing need, linked to long-standing shortages of suitable accommodation sites. A 2023 study of 100 local planning authorities in England carried out by Friends, Families and Travellers found that 64% had failed to allocate sites as part of their development plan process, despite policy requirements<sup>2</sup>.
- 1.2 Camden Council's 2013 Site Allocations Plan did not allocate any sites for Gypsies, Travellers, or Travelling Showpeople, but indicated that the Council would carry out a needs assessment and work to address those needs. The Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment, completed in 2014, identified a need for 16 additional residential pitches for Gypsies and Travellers to be delivered by 2031. The assessment indicated that there was no requirement for additional transit pitches or additional plots for Travelling Showpeople. An emerging new London wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) is under way and is due to provide London Borough of Camden (LBC) and other London boroughs with up-to-date information on need in 2024.
- 1.3 At the end of June 2023, LBC invited consultants to submit quotations to carry out a Gypsy and Traveller Site Identification Study. The brief for the Study was framed in the context of the needs assessed in 2014 and did not include identification of potential transit sites or plots for Travelling Showpeople. The brief also noted the very low financial value of Gypsy and Traveller pitches relative to other land uses in Camden and directed the consultants to consider digital mapping of the Council's own land ownerships. The brief did not seek consideration of privately-owned land.
- 1.4 This report presents the findings of the Camden Gypsy and Traveller Site Identification Study (GTSIS), commissioned by LBC and carried out by AECOM from August 2023 to October 2024, to inform and support the review of Camden's Local Plan alongside results of the emerging London wide GTANA.
- 1.5 Key elements of the GTSIS, in line with agreed study parameters were:
  - Identifying Council owned land (freehold and leasehold) potentially available for use as Gypsy and Traveller accommodation, and any constraints on land availability
  - Undertaking a high-level GIS-driven suitability assessment; and subsequently;
  - Identifying a shortlist of Council owned land that would be potentially available, suitable, and achievable for allocation to meet the needs of Gypsies

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<sup>1</sup> This report, as per the government's Planning Policy for Traveller Sites document updated in 2023, uses the term 'Gypsy and Traveller' to mean "Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such".

<sup>2</sup> [Kicking the can down the road: New report on site provision over the past 60 years - Friends, Families and Travellers \(gypsy-traveller.org\)](https://www.friends-families-travellers.org/)

and Travellers, subject to further assessment to be undertaken by LBC after GTSIS.

- 1.6 In line with agreed study parameters, GTSIS was confined to examining land within Council ownership only, all sifting and assessment was desk-based, and no community engagement nor site visits were included in the scope of the study.
- 1.7 It is also worth noting that GTSIS, like all site assessment studies, is necessarily a snapshot in time, based on information which is available and can be substantiated through independent, high-level desk-based assessment at the time of the study by those undertaking the assessment. The assessment does not make policy decisions and does not weigh up or seek to prioritise different policy considerations. Further detailed, evolving information and considerations will be known to LBC, which will enable closer consideration of sites following GTSIS, as well as policy decisions which will lead to the selection of sites for allocation.

## 2. Methodology

- 2.1 AECOM's methodology, based on the proposal methodology and refined following the inception meeting and subsequent meetings with the client, is split into five stages.

### Stage 1 - Mobilisation

- 2.2 Following the initial inception meeting, AECOM agreed a Project Execution Plan (PXP) with the client, which set out the parameters for Camden GTSIS. Subsequently, AECOM and LBC carried out an information sharing exercise, during which LBC shared all relevant LBC data, GIS layers and other information required for GTSIS. Further GIS layers were secured through Emapsite and publicly available layers.
- 2.3 Layers related to LBC land ownership (Council freehold, leasehold, third party and miscellaneous ownership, and sold sites), to environmental and policy constraints, and to planning applications since 2018 (see data inventory in Appendix A).
- 2.4 It was also agreed between AECOM and LBC that, for any matters which cannot be reasonably established and substantiated with the aid of available mapping provided by LBC during the Information Sharing exercise, known constraints would be flagged as part of GTSIS as far as possible, but further subsequent detailed assessment will be required by LBC.

### Stage 2 - Policy & Context Review

- 2.5 Following the information exchange, AECOM reviewed and summarised relevant legislation, policy, guidance, and other planning and context considerations to be taken into account as part of the Camden GTSIS and as part of LBC's subsequent assessment (see Appendix E).

### Stage 3 - Site Identification and GIS set-up

- 2.6 Based on information shared by the client in Stage 1 and based on the context information gathered in Stage 2, AECOM set up a GIS database and WebGIS, available to AECOM and LBC for the duration of the assessment. All relevant Council owned sites and constraints, based on layers shared, were added to this WebGIS, ready for the subsequent sifting in Stage 4.

### Stage 4 - Sift Mapping

- 2.7 The sifting stage involved three sub-stages, sifting sites based on their **availability** (stage 4.1), **suitability** (stage 4.2), and **achievability** (stage 4.3) for Gypsy and Traveller accommodation, to produce a shortlist for LBC's further assessment and consideration. AECOM's approach was based on the Government's Planning Practice Guidance (PPG) on Housing and Economic Land Availability Assessment<sup>3</sup>, as well as AECOM's long track record of experience in producing a wide range of Site Assessments for Local Authorities and in delivering the Site Options and Assessment Technical Support

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<sup>3</sup> [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-and-economic-land-availability-assessment)

programme for Neighbourhood Plans across England on behalf of Locality and the Department for Levelling Up, Housing and Communities (DLUHC).

- 2.8 The foundation of this approach is that sites must be at least potentially suitable, available, and achievable for the proposed use (in this case, Gypsy and Traveller accommodation) before further consideration can be made. The methodology was specifically adapted to meet the requirements of the Camden GTSIS, in an appropriate and proportionate way.

## Stage 4.1 – Availability

- 2.9 AECOM first established the sites to be included in the GTSIS assessment, based on their availability for the use as a Gypsy and Traveller site, based on ownership mapping made available to AECOM.
- 2.10 To inform the development of the draft new Local Plan, LBC held a Call for Views from November 2022 to January 2023, which included a general Call for Sites, and a specific Call for Gypsy and Traveller sites. No Gypsy and Traveller sites were submitted for consideration to either Call.
- 2.11 LBC thus specified that GTSIS was to assume that only LBC owned sites would potentially be available for the proposed use. Availability was established on the basis of ownership GIS layers shared by LBC, showing all Council owned sites in the borough (freehold and leasehold), as well as some sites in third party or miscellaneous ownership which intersect with or abut Council owned sites and potentially affect their use.
- 2.12 AECOM's initial search focused on the Council's "**Ownership Freehold**" layer of sites, which are deemed to be confirmed as available. Secondly, AECOM considered the LBC's GIS layers showing their leasehold portfolio ("**Ownership Leasehold**" layer of sites). This included two categories of leasehold, one leased to LBC by a third-party freehold owner, and one leased by LBC to a third party leaseholder.
- 2.13 The assumption used was that the presence of any site **in the Ownership Leasehold layer, as well as in the Ownership Freehold layer** indicates that LBC owns the freehold of the site but has provided a lease to a third party. These sites are deemed to be potentially available, subject to further consideration by LBC of the leasehold terms and related constraints on the site.
- 2.14 Where a site is **included in the Ownership Leasehold layer but shows no overlap with the Ownership Freehold layer**, this was taken to indicate that LBC has a lease on another landowner's freehold. For these sites, the assumption is that these are also potentially available to be developed as Gypsy and Traveller sites, but that this would require permission from the freeholder. This makes these sites potentially less likely to be available.
- 2.15 Ownership layers marked as **Third Party** or **Misc.** are related to third party or miscellaneous land rights which may affect a Council owned site, for instance through rights of access. These layers are not considered as available sites in their own right but are used to flag constraints on any Council owned site they intersect with.
- 2.16 Any sites showing as in **former Council ownership** (a layer named **Ownership Freehold Sold**), were excluded as unavailable. Note that where



sites were identified as owned by the Council in the layers provided to AECOM but may be in the process of being sold or having been sold during the Study period of GTSIS, these sites were included in GTSIS, but should be excluded subsequently by LBC.

- 2.17 Finally, the **Ownership Freehold** layer also included a small number of **sites located outside the LBC boundary**. For the purposes of GTSIS they are deemed to be outside of the scope of the study. However, like all excluded sites they are listed in the GIS table of excluded sites, as excluded under sift 4.1 (ownership). There is a precedent of housing Council housing tenants outside of a borough. However, as need will be allocated to each borough by the Mayor in a London wide assessment, GTSIS considers that, unless planning for Gypsy and Traveller accommodation supply takes place jointly with another local authority, LBC will aim to first accommodate need within the borough.
- 2.18 While sites with extant planning permission of less than 3 years old from the commencement date of GTSIS or built out completions associated with a planning application less than 5 years old as of the commencement date of GTSIS are also considered unavailable, it was not possible to conclusively establish this through the mapping information available to AECOM. Camden Open Data Portal was used as a source for planning permissions, but no ready source was available to establish completions. Therefore, sites were not excluded on this basis.
- 2.19 All remaining sites which, on the basis of the above principles appeared available but where availability could not be conclusively established through the mapping information available to AECOM, were flagged as being available with a potential constraint to be investigated further. For these sites, LBC should establish availability in their subsequent more detailed assessment, including through Land Registry searches.
- 2.20 In summary, this first sifting task focused on establishing potentially available sites, flagging potential constraints related to ownership rights. There were 13 freehold title sites and 3 leasehold title sites sifted out in sifting stage 4.1, as well as portions of other, larger title sites.

## Stage 4.2 - Suitability

- 2.21 The second sifting stage took the sites remaining from Stage 4.1 Availability Sift forward for high-level Suitability Sifting. The purpose was to establish which of the potentially available sites are potentially suitable, based on high-level environment and policy constraints.
- 2.22 First, a minimum **size threshold** of 150 square metres was applied to sites. This was based on the size of the two existing Traveller sites within the borough. These are very small, with 1 and 3 pitches on each site respectively, and site sizes of approximately 188 and 444 sq. m size each. Note that best practice guidance states that typically, a small Gypsy and Traveller site would accommodate 3-4 pitches and warns that small sites easily become overcrowded. However, as sites are in very short supply in Camden, it was deemed suitable to include sites of minimum 150 square metres in GTSIS, to ensure no possible sites were missed.

2.23 Next, other **primary constraints were used for excluding sites or parts of sites**, primarily based on Camden’s interactive environment and policy map GIS layers. This process involved clipping GIS shapefiles to remove portions of land from title sites which intersected with one or more of the identified mapped constraints. Where a mapped constraint was provided to AECOM as a point or line feature and converted to a polygon, this is specified in the table below. Note that this process of exclusion through intersects with constraints did not result in the removal of entire title sites unless their entirety was covered by the relevant mapped constraint. Where a constraint only covered part of a title site, one or more smaller individual land parcels resulted from the larger title site being clipped.

2.24 The following table summarises all constraints used to exclude sites or parts of sites as unsuitable (please note these are listed alphabetically and the order does not imply any order of importance):

**Table 1: Primary constraints used to exclude sites as unsuitable**

Constraints	Approach	Justification
<b>Allotments</b>	Exclusion of all land which intersects with this designation	National Planning Policy Framework (NPPF) paragraph 96 London Plan Policy G8
<b>Article 4 Directions on Land Use</b>	Exclusion of any areas to which Article 4 Directions on Land Use Classes apply, removing permitted development rights for change of use from Use Class E (Commercial, Business, and Service) to Use Class C3 (dwellinghouses) in specific areas to which the Direction applies. This is to safeguard land for commercial purposes including town centre uses.	Local Plan Policy TC2 Camden's centres and other shopping areas Camden Article 4 Directions on Land Use Classes
<b>Council owned homes and residential garden land</b> (of individual or sub-divided terraced properties)  (Partially suitability constraint, partially availability constraint)	Council owned homes and residential garden land (of individual or sub-divided terraced properties) were excluded, as far as this could be conclusively identified, using a combination of Mastermap data and housing block layers provided by LBC. Amenity space associated with housing estates was retained for further consideration.	NPPF paragraph 72 Local Plan Policy A2 (Open Space) part e)  These sites are also deemed by LBC, as the landowner and local planning authority, to be unavailable and unsuitable, due to the fact that availability of and access to Council housing and private open space of Council tenants is already constrained by the dense urban nature of the borough and high land values.
<b>HS2 Phase 1 Safeguarding</b>	Exclusion of all land which intersects with this designation	HS2 royal assent and 'safeguarding directions' for the

Constraints	Approach	Justification
		HS2 rail line issued by Secretary of State for Transport;
<b>Listed Buildings</b>	Exclusion of all land covered by polygons provided by LBC. Note that the presence of a listed building on a larger site is not sufficient justification for excluding the entire site.	NPPF paragraph 206-209 London Plan Policy HC1 Local Plan policy D2 Heritage
<b>Local Plan Aggregates Safeguarding</b>	Exclusion of all land which intersects with this designation	NPPF 20, 215-218
<b>Local Plan Habitat Corridor</b>	Line features using 10m buffer on either side of the line to turn this into a polygon	NPPF para 11 and footnote 7
<b>Local Green Space</b>	Exclusion of all land which intersects with this designation	NPPF para 11, 101-103 and footnote 7
<b>Local List</b>	Exclusion of all land which is wholly occupied by a locally listed building or structure. As with Listed Buildings, the presence of a locally listed building on a larger site is not sufficient justification for excluding the entire site.	NPPF paragraph 206-209 London Plan Policy HC1 Local Plan policy D2 Heritage
<b>Local Nature Reserve</b>	Exclusion of all land which intersects with this designation	NPPF 185 Local Plan Policy A3
<b>Open Space</b>	Exclusion of all land which intersects with this designation	NPPF 103 London Plan Policy GG2 and G4
<b>Overlooking</b>	Exclusion of sites located at less than 18m distance from a building of more than 12m / 4 storeys in height), where a fence cannot be	Camden Planning Guidance (CPG) on Amenity, paragraph 2.2-2.10 on Overlooking and

Constraints	Approach	Justification
	expected to mitigate issues of overlooking; based on joining information from Emapsite and Mastermap data on building heights	privacy and on Separation between buildings
<b>Playgrounds</b>	Exclusion of all land which intersects with this designation Point features provided were converted into polygons using a 10-metre radius.	NPPF 103 London Plan Policy S4
<b>Priority Habitat Inventory</b>	Exclusion of all land which intersects with this designation	NPPF 185-188
<b>Rail</b>	10m buffer around above-ground rail and London Underground lines	DMPO 2015 s.16
<b>Registered Parks and Gardens</b>	Exclusion of all land which intersects with this designation	NPPF paragraph 206-209 London Plan Policy HC1 Local Plan policy D2 Heritage
<b>Roads</b>	Exclusion based on Mastermap topographical data	NPPF 114-116
<b>Scheduled Monuments</b>	Exclusion of all land which intersects with this designation	NPPF paragraph 206-209 London Plan Policy HC1 Local Plan policy D2 Heritage
<b>Schools</b>	Exclusion of schools  <u>State school</u> point features were created on the basis of LBC school postcodes (LBC website was used to ensure up to date data on recently closed schools was taken into account) and manually adjusted on the basis of address	NPPF 99 London Plan Policy S3

Constraints	Approach	Justification
	<p>information; this point data was subsequently converted to a polygon, commensurate with the land registry title plan associated with each school; manual adjustment was undertaken on the basis of satellite mapping information to include associated school playing fields, school sports pitches, school playgrounds etc as far as possible on the basis of information available.</p> <p>Note that this sift also excluded two hospitals which contain state schools on site. For the Royal Free Hospital this includes the Royal Free Hospital Children's School<sup>4</sup> and for Great Ormond Street Hospital, the Great Ormond Street Hospital for Children School).</p> <p><u>Independent school</u> point features were provided by LBC and converted to polygons using a 10-metre radius.</p> <p>Further verification of school site boundaries will be required with the education department as part of LBC's further assessment following GTSIS.</p> <p>AECOM has also indicated to LBC where sites are within 25 metres of a school (not as a way of</p>	

<sup>4</sup> <https://www.royalfree.camden.sch.uk/>

Constraints	Approach	Justification
	ruling out sites but rather as a constraint, with further investigation required subsequently by LBC).	
<b>SINC</b>	Exclusion of all land which intersects with this designation	London Plan Policy G6
<b>SSSI</b>	Exclusion of all land which intersects with this designation	NPPF para 11 and footnote 7

2.25 Where only parts of sites were excluded, on the basis of the above primary constraints, clipped parcels of land resulted. A **second size threshold sift** filtered out:

- Land parcels under the size threshold of 150 square metres; and
- Narrow land parcels under a minimum width of 5 metres (this includes land with a maximum width of 5 metres and land with an average width of 5 metres or less)

2.26 The minimum width threshold was added to ensure that remaining sites would be able to, at a minimum, accommodate a 3.2 metres wide caravan, plus appropriate circulation space, in line with government design guidance.<sup>5</sup>

2.27 There were 2,712 freehold title sites and 230 leasehold title sites (some of which overlapped) sifted out in sifting stage 4.2, as well as portions of remaining larger sites, where sites were clipped on the basis of removing constrained portions of land.

2.28 A Project Progress Meeting was convened between AECOM and LBC during sifting stage 4.2, to discuss remaining sites and any issues encountered.

2.29 It should be noted that sifting stage 4.2 was undertaken using a mixture of automated sift mapping via GIS, on the basis of GIS constraints layers, and by manual sifting undertaken by AECOM planners, on the basis of mapped and written constraints information, as well as satellite imagery, as there were limitations to the information available for GIS sifting.

2.30 There were also a number of **secondary suitability constraints** which were flagged by AECOM, but **not used to exclude sites**:

- Locally Significant Industrial Sites (LSIS)<sup>6</sup> – were flagged but deemed to be potentially suitable, especially for mixed use Traveller sites co-locating residential and employment uses, as recommended for consideration in Policy B of the Planning Policy for Traveller Sites (PPTS);
- Metropolitan Open Land (MOL) - While PPTS states that Travellers' sites are considered as inappropriate development on MOL, it is possible for local authorities to remove land from MOL through their Local Plan in exceptional circumstances, as set out in our Policy and Context review section below;
- Flood Risk – There is no known land in Flood Zone 3b in the study area. Where sites are at high risk of surface water flooding, this was highlighted using mapping provided by AECOM's flood team which identifies sites at high risk of surface water flooding and flooding from reservoirs, in conjunction with three LBC "flood streets" layers (from three different years). Note that any further consideration of flood risk should be made by LBC in their subsequent detailed assessment, in conjunction with AECOM's SFRA;

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<sup>5</sup> See Chapter 7 of [designinggypsiesites.pdf \(publishing.service.gov.uk\)](#), also referenced in our policy and guidance review.

<sup>6</sup> Where there is overlap between LSIS and Camden's designated Industry Areas, the Local Plan designation boundary was used.



- Tree Preservation Orders (TPOs) – A 10 metre buffer was added to point data on TPOs to ensure intersects are picked up on relevant sites;
- Waste Safeguarding;
- Sites with recent planning permissions, adopted allocations, regeneration or estate renewal schemes, which are to AECOM’s knowledge not yet commenced or appear to have stalled, as well as proposed new Local Plan allocations, and sites earmarked for development and improvements in documents such as emerging Local Plan work and Supplementary Planning Documents;
- Crossrail 2 Safeguarding Area;
- Conservation Areas; and
- Archaeological Priority Areas.

2.31 The presence of these secondary constraints was flagged on sites remaining after the sifting process, as far as possible on the basis of available data.

2.32 Where issues were encountered by AECOM with any constraints identified in the client brief (such as lack of possible justification or reliable identification through the available mapping), this was flagged to and discussed with the client, and new parameters were agreed, with a view of ensuring that all parameters were transparent, justified, and possible to identify in a proportionate and justifiable manner. This meant that sites were only excluded where this exclusion was based on a primary constraint listed in this report, evidenced through GIS or online mapping or satellite imagery, justified by relevant policy, and documented on GTSIS long- and short-lists of sites. This was to ensure that AECOM’s approach could be transparently followed by readers including a Local Plan Examiner, and if necessary recreated for any further future assessment.

### Stage 4.3 – Achievability

2.33 The third sifting stage considered achievability at a high level, by considering more qualitative constraints. This stage was undertaken entirely on a manual basis and resulted in the exclusion of 78 freehold title sites and 10 leasehold title sites (some of which overlapped).

2.34 Constraints considered in stage 4.3 included, as agreed with the client:

- The likelihood of facilitating access – Based on available mapped information, AECOM excluded land which has no apparent potential for vehicular or pedestrian access, as a result of complete isolation of the land from a public highway. AECOM also excluded land which would block access to other properties if developed, for instance estate roads, walkways, or footpaths. Finally, AECOM flagged land where access might potentially be an issue, for instance where land is located at a distance from the public highway or estate roads, or where access appeared narrow, but did not exclude land on this basis;
- Steeply sloping topography – This matter was considered but no exclusions were made on this basis as this was not an issue on any land parcels remaining after sift 4.2;

- Proximity to other uses which are likely to be incompatible with development of Traveller sites was considered and based on the severity of the issue, land was excluded, or the matter was flagged (e.g. sources of significant noise or other pollution issues);
- Parcels of land which would cause loss of amenity or community value if developed were excluded (for example, allotments, nurseries, or playgrounds), although in some cases a parcel of land was retained for further consideration where design had the potential to allow for the use in question to be relocated;
- Parcels of land with recent planning permissions, allocations, regeneration or estate renewal schemes which AECOM are aware of recently commencing or completing were excluded; and
- The potential for deliverability issues, such as the potential requirement for demolition or land remediation, was flagged for further consideration.

## Shortlist of Sites and Register of all Sites Assessed

- 2.35 Following the third sifting stage 4.3, AECOM produced a shortlist of 21 parcels of land, forming part of 18 freehold title sites, which passed all three stages of assessment (4.2, 4.2 and 4.3), as mapped in Appendix C.
- 2.36 A RAG (Red Amber Green) site assessment rating system, which had previously been considered, was not used, as sites which would have rated “Red” were already excluded, and no sites rating “Green” remained for further consideration, due to differing constraints being present on all sites. Remaining parcels of land are all considered as different levels of “Amber”, and further differentiation is flagged in AECOM’s commentary (set out in Appendix B). If required, a rating of sites from most to least suitable / achievable will have to be determined by LBC, on the basis of further assessment and by weighing up different policy considerations as part of the emerging Local Plan, following GTSIS.
- 2.37 For the duration of the project, the AECOM WebGIS hosts GTSIS’s
- original land title sites;
  - boundaries of remaining parcels of land after the sifts;
  - boundaries of excluded parcels of land; and
  - constraint layers provided by LBC.
- 2.38 The WebGIS thus provides a register of all sites assessed, including all sites excluded, showing the sifting intersect which led to the site’s exclusion. The register contains 2,821 freehold title sites and 243 leasehold title sites and is thus a rather large spreadsheet file, which is not practical to be included as an Appendix to this report and is available as a separate spreadsheet. A static map of all sites assessed is provided in Appendix D. The original Council identifier for each site submitted by LBC for review, together with a unique AECOM identifier for each parcel of land can be used to search the register of all sites for a specific site.

## 3. Summary of Results, Conclusions, and Next Steps

3.1 Based on the 2,821 freehold and 243 leasehold title sites originally identified by LBC for assessment through GTIS:

- 13 freehold and 3 leasehold title sites were excluded in sift 4.1;
- 2,712 freehold and 230 leasehold title sites were excluded in sift 4.2; and
- 78 freehold and 10 leasehold title sites were excluded in sift 4.3.
- 21 freehold parcels of land remained after sift 4.3, forming part of 18 freehold land titles originally submitted by LBC for GTSIS. No leasehold parcels were shortlisted, although five of the short-listed Camden freehold sites overlap to some extent with a leasehold title.

3.2 The **18 freehold title sites** containing the **21 land parcels shortlisted** as part of GTSIS are as follows<sup>7</sup>:

- Land between 23 and 25 Ravenshaw Street, NW6 6NN
- Land rear of 6-8 Acol Road, NW6 3AH
- Land at St Mary's Mews, NW6 3RF (rear of 267 Goldhurst Terrace)
- Land at St Mary's Mews NW6 3RF (adjacent to 1 St Mary's Mews)
- Land at Sidney Boyd Court, NW6 4QZ
- Land east of Constable House, NW3 3QA
- Land south of 60 Bassett Street, NW5 4PH
- Athlone Street garages, NW5 3EN
- Garages at Spencer Rise, NW5 1AP
- Sanderson Close parking, NW5 1TS
- Parking rear of Agar Grove parcel 1, NW1 9XL
- Parking rear of Agar Grove parcel 2, NW1 9XL
- Land at 177 Finchley Road, NW3 6LB
- Camley Street Industrial Estate, N1C 4PF (two parcels)
- Former depot off Arlington Road, NW1 7DB
- West Kentish Town Estate, NW5 4RG (three parcels)
- Land off Freight Lane, N1C 4BE
- Frideswide Place, NW5 2AA

3.3 Within some of the identified parcels there may be particular opportunities for more efficient use of land, for instance optimising the use of surface car

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<sup>7</sup> Note that parcel location details, including postcodes, were determined by AECOM to provide a consistent means of identifying sites as the GIS data provided by LBC did not include address information for all sites.

parking. There are individual sites and portions of these areas of opportunity that would not be acceptable, for instance because of industrial uses, presence of railway lines, or loss of estate open space, subject to further investigation and policy choices by LBC.

- 3.4 GTSIS high level assessment found that all of the 21 parcels of land remaining after GTSIS sifts 4.1, 4.2, and 4.3 are potentially available, suitable, and achievable for development as Gypsy and Traveller accommodation, but have constraints, some significant. An example would be short-listed parcels of land adjacent to active industrial uses where the layout of the existing use may require remodelling and where mitigation measures would be required in relation to noise and air pollution and to ensure pedestrian safety.
- 3.5 The Council has also indicated that a number of the sites short-listed above have been sold since the Council ownerships were mapped or are subject to active development proposals. LBC will need to consider their availability through further assessment following GTSIS.
- 3.6 Further constraints may also be identified as part of LBC's subsequent detailed assessment of remaining land parcels. While the land parcels identified as part of GTSIS are considered potentially available, suitable, and achievable for development as Gypsy and Traveller accommodation, subject to the results of LBC's subsequent further detailed assessment, some or all of these 21 parcels may not be appropriate for allocation as part of the emerging Local Plan.
- 3.7 It should also be noted that some land parcels have been grouped together, where they could only come forward in combination, for instance where one parcel of land secures necessary space for access to the other.

## Next Steps

- 3.8 LBC intends, subsequent to GTSIS, to undertake more detailed site-specific assessment, which was not included within the scope of GTSIS. LBC will also have to make decisions on the basis of newer and evolving information available to them, and in line with complex policy considerations, as part of their emerging new Local Plan.
- 3.9 If and when LBC decides to take more detailed site-specific assessment work forward, AECOM recommends that this could consider the following elements, for which appropriate consideration was not included in the scope of GTSIS:
  - More detailed consideration of ownership;
  - More detailed consideration of secondary constraints flagged as part of GTSIS;
  - Consideration of whether the site is able to connect to utilities infrastructure;
  - Consideration of daylight, noise, vibration, air quality, and presence of contaminated land;
  - Consideration of suitability, potential capacity, and design of a site (including how many pitches can be accommodated on what part of a site based on the site size and configuration or irregular shape);;
  - Potential revisiting of Local Plan designation boundaries;
  - Presence of relevant Neighbourhood Plan policies, based on any Neighbourhood Plan layers available to LBC; and

- Complex, evolving, and interacting multiple policy considerations as part of the evolving new Local Plan.
- 3.10 It is also recommended that LBC engage further with the GLA and neighbouring boroughs over the results of London-wide GTANA emerging at the time of writing. The London-wide GTANA will determine the minimum number of sites needed in Camden, and findings are expected to be published later in 2024.
- 3.11 Once published, the London-wide GTANA findings should help inform LBC's statutory duties to plan for and meet the needs of Gypsy and Traveller households, as per the requirements set out in Policy H14 of the London Plan 2021 and the National Planning Policy Framework (NPPF) 2023. As part of the emerging Camden Local Plan review, LBC's strategic policies should seek to identify a sufficient supply and mix of sites, taking into account their availability, suitability, and achievability, including deliverability considerations. It should also be noted that, as guided by the NPPF, a five-year supply of deliverable sites for Travellers should be assessed separately from other housing sites, in line with the PPTS.
- 3.12 LBC should also seek to continue collaborative working with the London Gypsy, Roma and Traveller Information Network set up by the GLA, the local Gypsy and Traveller community in and around Camden, London Gypsies and Travellers, Friends, Families & Travellers, and other appropriate organisations and stakeholders.
- 3.13 Furthermore, the findings of GTSIS, and of subsequent detailed assessment and engagement by LBC, will also need to be taken into account in the Strategic Environmental Assessment report accompanying subsequent consultation on Camden's Local Plan.

## Appendix A - Data Inventory

Layer	Dataset	Source	Copyright
Boundaries	Camden Borough Boundary	OS	Contains public sector information licensed under the Open Government Licence v3.0.
	AddressBase Land Uses (230803)	Emapsite	© Crown copyright and database rights 2023. Ordnance Survey 0100031673
	Mastermap Data	Emapsite	© Crown copyright and database rights 2023. Downloaded 3 <sup>rd</sup> August 2023
Heritage	Listed Building (Grade)	Historic England	© Historic England 2023 and for spatial data only add Contains Ordnance Survey data © Crown copyright and database right 2023. Further data received from the London Borough of Camden 23 <sup>rd</sup> October 2023.
	Scheduled Monument	Historic England	© Historic England 2023 and for spatial data only add Contains Ordnance Survey data © Crown copyright and database right 2023.
	Registered Park and Garden	Historic England	© Historic England 2023 and for spatial data only add Contains Ordnance Survey data © Crown copyright and database right 2023.
Transport	Railway Station	OS	Contains public sector information licensed under the Open Government Licence v3.0.
	Railway	OS	Contains public sector information licensed under the Open Government Licence v3.0.
	Crossrail 2 Safeguarding	TfL	Transport for London (TfL) <a href="#">Safeguarding - Crossrail 2</a>
	Roads	OS	Contains public sector information licensed under the Open Government Licence v3.0.
Utilities	Cable	National Grid	© National Grid 2023
	Substation	National Grid	© National Grid 2023
Employment / Economy	Locally Significant Industrial Sites (LSIS)	London Datastore	London Datastore 2023 <a href="https://data.london.gov.uk/dataset/locally_significant_industrial_sites">https://data.london.gov.uk/dataset/locally_significant_industrial_sites</a>

Layer	Dataset	Source	Copyright
Client Data	TPO within Conservation Area (Point)	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	School <sup>8</sup> Special	Data Received on 3rd August 2023 from the London Borough of Camden. Camden Council Website.	London Borough of Camden
	School Secondary	Data Received on 3rd August 2023 from the London Borough of Camden. Camden Council Website.	London Borough of Camden
	School Primary	Data Received on 3rd August 2023 from the London Borough of Camden. Camden Council Website.	London Borough of Camden
	School Nursery	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	School Independent	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Playground	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Planning TPO	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Planning Applications Since 2018 (Point)	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Article 4 Directions	Data Received on 2 <sup>nd</sup> November 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Third Party	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Freehold None	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
Listed Buildings	Data received from the London Borough of Camden 23 <sup>rd</sup> October 2023 (See also above)	London Borough of Camden	

<sup>8</sup> Note that schools were identified using point data provided by LBC. A manual process was then undertaken by AECOM to create boundaries around the school sites, including playing fields, playgrounds and other ancillary space, checking these against address information on the Camden Council website.

Layer	Dataset	Source	Copyright
	Local List	Data Received on 3rd August 2023 from the London Borough of Camden; Update received from the London Borough of Camden 23 <sup>rd</sup> October 2023.	London Borough of Camden
	Housing Block Boundaries	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	TPO Within Conservation Area (Line)	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Planning TPO	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Planning Applications Since 2018 (Line)	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Misc	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Habitat Corridor	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Flood Streets 2021	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Flood Streets 2002	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Flood Streets 1975	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	TPO Within Conservation Area (Polygon)	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Site Allocations	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Planning TPO	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Planning Applications Since 2018	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Third Party	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Misc Region	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden



Layer	Dataset	Source	Copyright
	Ownership Misc Ellipse	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Leasehold	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Freehold Sold	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Ownership Freehold	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Waste Safeguarding	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Transport Safeguarding	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan SINC	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Open Space SSSI	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Open Space MOL	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Open Space	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Industry Area	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Plan Agg Safeguarding	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local List	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Green Space	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Local Flood Risk Zone Region	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Archaeological Priority Area	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Allotment Region	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden

Layer	Dataset	Source	Copyright
	HS2 Phase 1 Safeguarding	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Housing Estate Boundaries	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Housing Block Boundaries	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
	Building Height Data	Data Received on 23rd October 2023 from the London Borough of Camden.	
	Conservation Area	Data Received on 3rd August 2023 from the London Borough of Camden.	London Borough of Camden
Flooding - Client Data	OS Rivers	Data Received on 14th August 2023 from the London Borough of Camden.	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Statutory Main River Map	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Spatial Flood Defences	Data Received on 14th August 2023 from the London Borough of Camden	© Environment Agency copyright and/or database right 2023. All rights reserved. Some features of this map are based on digital spatial data from the Centre for Ecology & Hydrology, © NERC (CEH). © Crown copyright and database rights 2023 Ordnance Survey 100024198. London Borough of Camden
	Flood Streets - 1975	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Flood Streets - 2002	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Flood Streets - 2021	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Lost River	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Regents Canal	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	LFRZ	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
WFD	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden	

Layer	Dataset	Source	Copyright
	Reservoir Flood Extents Dry Day	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents - Wet Day	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents - Wet Day Test	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents Dry Day - Hampstead Pond No 1	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents Wet Day - Hampstead Pond No 1	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents Dry Day - Highgate Pond No 2	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents Wet Day - Highgate Pond No 2	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents Dry Day - Highgate Pond No 3	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents Wet Day - Highgate Pond No 3	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents - Maiden Lane	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extents - Fluvial Contribution	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Critical Drainage Area Extent	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Reservoir Flood Extent	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden

Layer	Dataset	Source	Copyright
	Reduction in Risk of Flooding from Rivers and Seas	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Risk of Flooding from Rivers and Seas	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Flood Alert	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Flood Alert 1	Data Received on 14th August 2023 from the London Borough of Camden	London Borough of Camden
	Flood Storage Areas	Data Received on 14th August 2023 from the London Borough of Camden	© Environment Agency copyright and/or database right 2023. All rights reserved. Some features of this map are based on digital spatial data from the Centre for Ecology & Hydrology, © NERC (CEH). © Crown copyright and database rights 2023 Ordnance Survey 100024198. London Borough of Camden
	Flood Warning Areas	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Recorded Flood Outlines	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Historic Flood Map	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Risk of Flooding from Surface Water - 1 in 30	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Risk of Flooding from Surface Water - 1 in 100	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Risk of Flooding from Surface Water - 1 in 1000	Data Received on 14th August 2023 from the London Borough of Camden	Contains public sector information licensed under the Open Government Licence v3.0. London Borough of Camden
	Flood Zone 3	Data Received on 14th August 2023 from the London Borough of Camden	© Environment Agency copyright and/or database right 2023. All rights reserved. © Crown copyright and database rights 2023 Ordnance Survey 100024198. London Borough of Camden
	Flood Zone 2	Data Received on 14th August 2023 from the London Borough of Camden	© Environment Agency copyright and/or database right 2023. All rights reserved. Some features of this map are based on digital spatial data from the Centre for Ecology & Hydrology, © NERC (CEH). © Crown copyright and database rights 2023 Ordnance Survey 100024198. London Borough of Camden

Layer	Dataset	Source	Copyright
Environment	Open Greenspace	OS	Contains public sector information licensed under the Open Government Licence v3.0.
	Area of Outstanding Natural Beauty	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Agricultural Land Classification	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Ancient Woodland	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Country Park	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Historic Landfill	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Local Nature Reserve	Natural England	© Natural England copyright. Contains Ordnance Survey data © Crown Copyright and database right 2023, NB This national dataset is "indicative" not "definitive". Definitive information can only be provided by individual local authorities and you should refer directly to their information for all purposes that require the most up to date and complete dataset.
	National Character Area	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	National Nature Reserve	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	National Park	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	National Trail	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Priority Habitat Inventory	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Ramsar	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Site of Special Scientific Interest	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
Special Area of Conservation	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.	

Layer	Dataset	Source	Copyright
	Special Protection Area	Natural England	© Natural England copyright 2023. Contains public sector information licensed under the Open Government Licence v3.0.
	Surface Water Line	OS	Contains public sector information licensed under the Open Government Licence v3.0.
	Surface Water Area	OS	Contains public sector information licensed under the Open Government Licence v3.0.
	Woodland	OS	Contains public sector information licensed under the Open Government Licence v3.0.
	Tidal Water	OS	Contains public sector information licensed under the Open Government Licence v3.0.

## Appendix B– Table of Shortlisted Sites

The following Appendix table lists the 18 title sites containing the 21 parcels of land shortlisted for further detailed assessment by LBC. A more detailed table showing all of the primary constraint intersects is available as a separate spreadsheet.

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
462	Title No: 167500	275	Land between 23 and 25 Ravenshaw Street, NW6 6NN	197.55	472.64	Current use of site is small parking area between residential properties on Ravenshaw Street. If allocated, alternative arrangements for current use would need to be considered. Constraints include potential for overlooking from habitable rooms in the adjacent properties and potential noise impact from railway to the west.
622	Title No's 362418 and 362490	608	Land rear of 6-8 Acol Road, NW6 3AH	182.94	1078.93	Current use of site comprises surface car parking to the rear of residential blocks. If allocated, alternative arrangements for current use would need to be considered. Constraints include narrow single vehicle access from Acol Road and location within a Conservation Area. Land appears well concealed from views from habitable rooms by vegetation.
632	Title No: 62249	630	Land at St Mary's Mews, NW6 3RF (rear of 267	333.18	967.75	Current use of site is parking and garages to rear of 267 Goldhurst Terrace. There may also be a refuse store for adjacent apartments located on this site, with potential need for refuse vehicle access. If allocated, alternative

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
			Goldhurst Terrace)			arrangements for current use would need to be considered. Site is immediately adjacent to another study site (Land at St Mary's Mews NW6 3RF - adjacent to St Mary's Mews - AECOM ID 633) and could potentially be brought forward together. Constraints include location within a Conservation Area.
633	Title No: NGL224688	631	Land at St Marys Mews , NW6 3RF (adjacent to 1 St Mary's Mews)	228.68	2095.56	Current use of site comprises parking and garages accessed via St Mary's Mews. There may also be a refuse store for adjacent apartments located on this site, with potential need for refuse vehicle access. If allocated, alternative arrangements for current use would need to be considered. Site is located immediately adjacent to another study site (Land at St Mary's Mews -rear of 267 Goldhurst Terrace - AECOM ID 632) and could potentially be brought forward together. Due to its limited size, this site is less likely to be suitable without the neighbouring larger site. Constraints include location within a Conservation Area.
784	Title No: LN75251	829	Land at Sidney Boyd Court, NW6 4QZ	5724.54	9069.42	Current use of site comprises land at Sidney Boyd Court (a Council residential block), including amenity open space, playgrounds, a MUGA, parking and garages. Constraints include location within a Conservation Area.



Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
						Some of the site is unsuitable due to overlooking from blocks of 4-7 storeys to north, south and west of site, and the central part of the site area contains the playgrounds and MUGA. If allocated, alternative arrangements for current uses would need to be considered and site design should avoid overlooking. The eastern part of the site, accommodating parking and garages, appears to have greatest potential (between 26-28 Acol Road and 17-19 Woodchurch Road).
1016	Title No: NGL454800	1385	Land east of Constable House, NW3 3QA	661.22	7568.18	Current use of site is an area of green space and hardstanding east of a residential block on the corner of Eton College Road and Adelaide Road. Constraints include potential for flooding (Adelaide Road was identified in Flood Streets 2021 data) and potential lack of privacy, depending on site intervisibility with residential block on opposite side of Eton College Road. The latter is partially mitigated by vegetation on the site boundary.

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
1434	Title No: 322984	2142	Land south of 60 Bassett Street, NW5 4PH	526.87	526.91	Site is an area of vacant land adjacent to residential blocks at 32-60 Bassett Street. Land may be used as garden but appears neglected. Access of site to residents is unclear. Constraints include: Location adjacent to plant room for residential blocks with potential for noise impact; location adjacent to Conservation Area; and potential overlooking from habitable rooms in the surrounding properties on Bassett Street, Coity Road and Allcroft Road.
1453	Title No: NGL83876	2169	Athlone Street garages, NW5 3EN	736.54	3660.06	Current use of site comprises garages between residential blocks and North London Railway (Overground). If allocated, alternative arrangements for current use would need to be considered. Site is located off Athlone Street and Grafton Road. Warden Road junction lies to the north. Constraints include: Potential noise impact from railway; potential requirement to inform Network Rail as a statutory consultee (as within 10 metres of the railway line); potential for overlooking from residential block on south side of Athlone Street; and location within draft Local Plan site allocation (Policy C13: West Kentish Town Estate).

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
1535	Title No: NGL18123	2375	Garages at Spencer Rise, NW5 1AP	180.86	5357.87	<p>Current use of site comprises garages and car parking to north-west of residential blocks on Spencer Rise. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include some potential for overlooking from residential blocks and terraced properties located opposite, and location within a Conservation Area.</p> <p>This land has also been identified by the Camden Community Investment Programme (CIP) Small Sites initiative and appears to be progressing towards more detailed consideration.</p>
1571	Title No: NGL190351	2420	Sanderson Close parking, NW5 1TS	740.91	14549.35	<p>Current use of site is parking area between residential properties and builder's yard north of Sanderson Close. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include: Partial location within draft Local Plan site allocation (Policy C3: Murphy Site); partial location (35%) within LSIS (but site does not appear to be in employment use); and part of site (20%) at risk of surface water flooding. This site was included within a consultation on the Camden Community Investment Programme (CIP)</p>

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
						Small Sites initiative but appears not to be progressing towards further consideration.
2006	Title No: NGL723724	3430	Parking rear of Agar Grove parcel 1, NW1 9XL	606.16	2033.33	Current use of site is parking and circulation space adjacent to another study site (Parking rear of Agar Grove parcel 2 - AECOM ID 2046). Sites could potentially be brought forward together. If allocated, alternative arrangements for current use would need to be considered. Constraints include presence of protected trees and location within a Conservation Area.
2046	Title No: NGL723718	3480	Parking rear of Agar Grove parcel 2, NW1 9XL	638.84	1448.25	Current use of site is parking and circulation space adjacent to another study site (parking rear of Agar Grove parcel 1 - AECOM ID 2006). Sites could potentially be brought forward together. If allocated, alternative arrangements for current use would need to be considered. Constraints include presence of protected trees and location within a Conservation Area.

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
2379	Title number unknown <sup>9</sup>	Land at 177 Finchley Road <sup>10</sup>	Land at 177 Finchley Road, NW3 6LB	354.70	1955.54	Current use of site is parking area between Goldhurst Terrace and Naseby Close. Constraints include narrow access from Goldhurst Terrace and location adjacent to a Conservation Area. If allocated, alternative arrangements for current use would need to be considered (unclear whether parking is required by shops / businesses on Finchley Road to support employment uses).

<sup>9</sup> Where no title number is stated for a site, this was not included in the data shared by LBC with AECOM. Missing title numbers, if not found in LBC records can be purchased from the Land Registry by Land Registry account holders (see [www.gov.uk/get-information-about-property-and-land/search-the-register](http://www.gov.uk/get-information-about-property-and-land/search-the-register)).

<sup>10</sup> Where this column does not contain a numbered address reference this was not included in the data shared by LBC and has been substituted for a text reference by AECOM

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
2500	NGL747861	Camley Street Industrial Estate	Camley Street Industrial Estate, N1C 4PF	10927.35  (two land parcels with individual areas of 1845.04 and 9082.31)	46886.20	This site contains two short-listed parcels. Current use of site is industrial (Camley Street Industrial estate), including areas of car parking and open land with potential for reallocation. If allocated, alternative arrangements for current uses would need to be considered. Constraints include: Potential for noise impact due to surrounding industrial uses; risk of surface water flooding on part of site (25%); location within draft Local Plan site allocation (Policy S5: 104-114 Camley Street and Cedar Way Industrial Site); location covered by Canalside to Camley Street SPD; and potential for loss of B2 and B8 class uses on parts of the site.
2588	NGL20610	Land in and around Jamestown Road	Former depot off Arlington Road, NW1 7DB	1106.20	2954.25	Current use of site is parking area with accompanying garages to the rear of commercial buildings (depot) and Camden Council offices, in active use for delivery and service vehicles. Possible use of part of site as B8 storage (unclear). If allocated, alternative arrangements for current uses would need to be considered. It is considered unlikely that this site is available for development while adjacent depot is operational. Constraints include potential for overlooking

Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
						from a residential block to the south of the site; location within draft Local Plan site allocation (Policy C18: Arlington Road former depot site); and potential for loss of employment land (unclear whether part of site use is B8).
2598	NGL83875	Weedington Road	West Kentish Town Estate, NW5 4RG	14,403.66  (three land parcels with individual areas of 725.35, 5452.90, and 8225.40)	32627.63	This site contains three short-listed land parcels. Current use of site is green space and parking area located to the north and south of Weedington Road. The land parcel to the south is currently used as a basketball court. If allocated, alternative arrangements for current uses would need to be considered. Constraints include: Location within draft Local Plan site allocation (Policy C13: West Kentish Town Estate); potential for overlooking from residential block to the south, for the parcel to the south of Weedington Road; and potential for overlooking from residential blocks to the north, east, and west of the site for the parcel to the north.

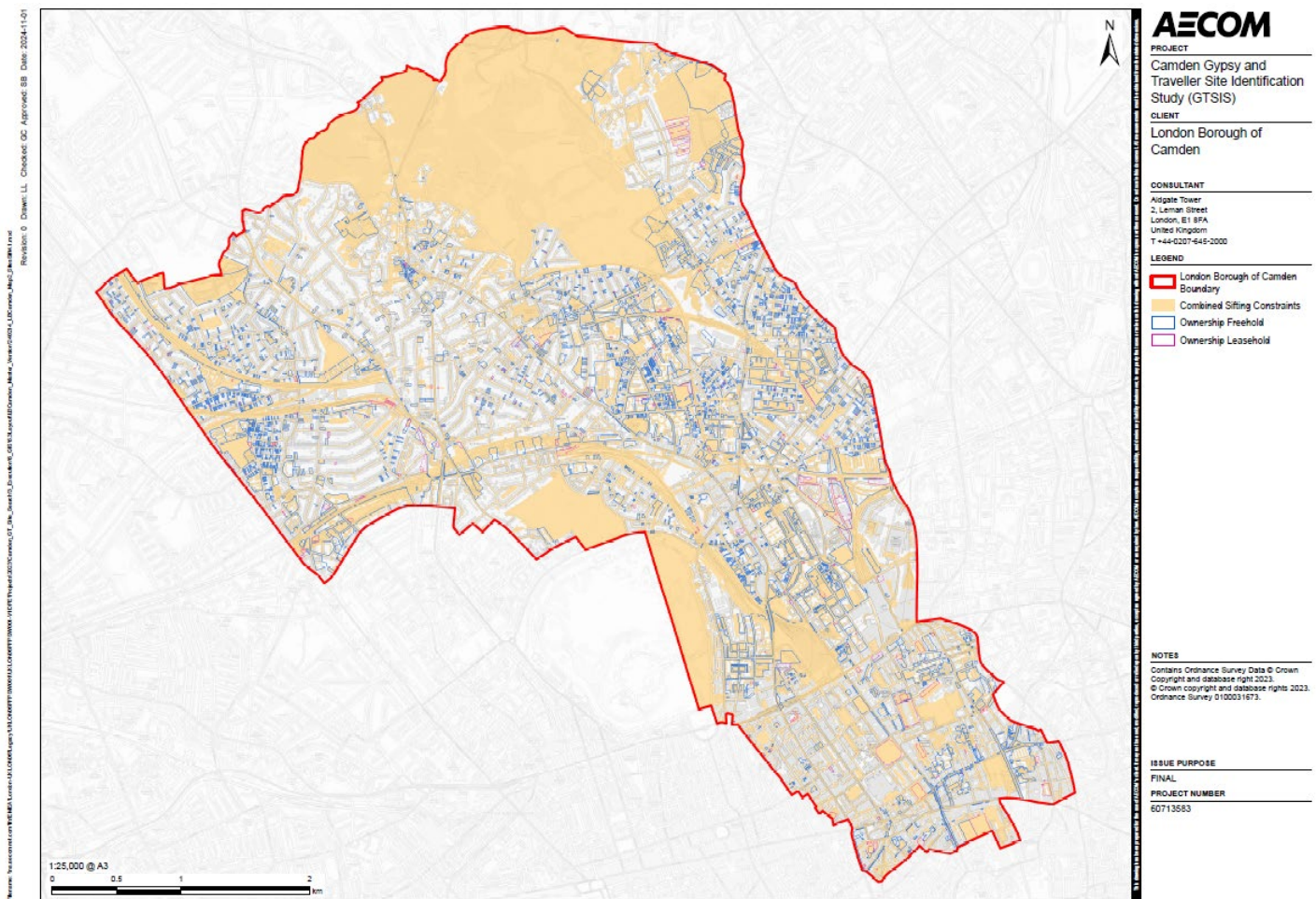
Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
2659	Title number unknown	Depot York Way	Land off Freight Lane, N1C 4BE	11355.70	46554.23	<p>Current use of site is Metroline bus washing facility, Camden Council MOT testing centre located to the north of Freight Lane, and a depot for Camden Accessible Travel Solutions comprising a site office and parking spaces. Site includes car parking, which may have potential for reallocation. If allocated, alternative arrangements for current uses would need to be considered.</p> <p>Constraints include: Potential for noise impacts due to the surrounding heavy industrial uses and multiple railways surrounding the site (including the North London Line, HS1, Midland line out of St Pancras, London and North Eastern Railway out of King's Cross, and connecting freight lines); impact from 'bad neighbour' uses (aggregates plant and concrete batching plant to the south of the site); potential for ground contamination due to present and historic industrial use including evidence of hazardous chemical storage signs; potential for loss of employment; potential conflict with current industrial uses including movement of HGVs; issues with pedestrian safety associated with the industrial nature of the area; and potential need to consult Network Rail (within 10 metres of railway).</p>



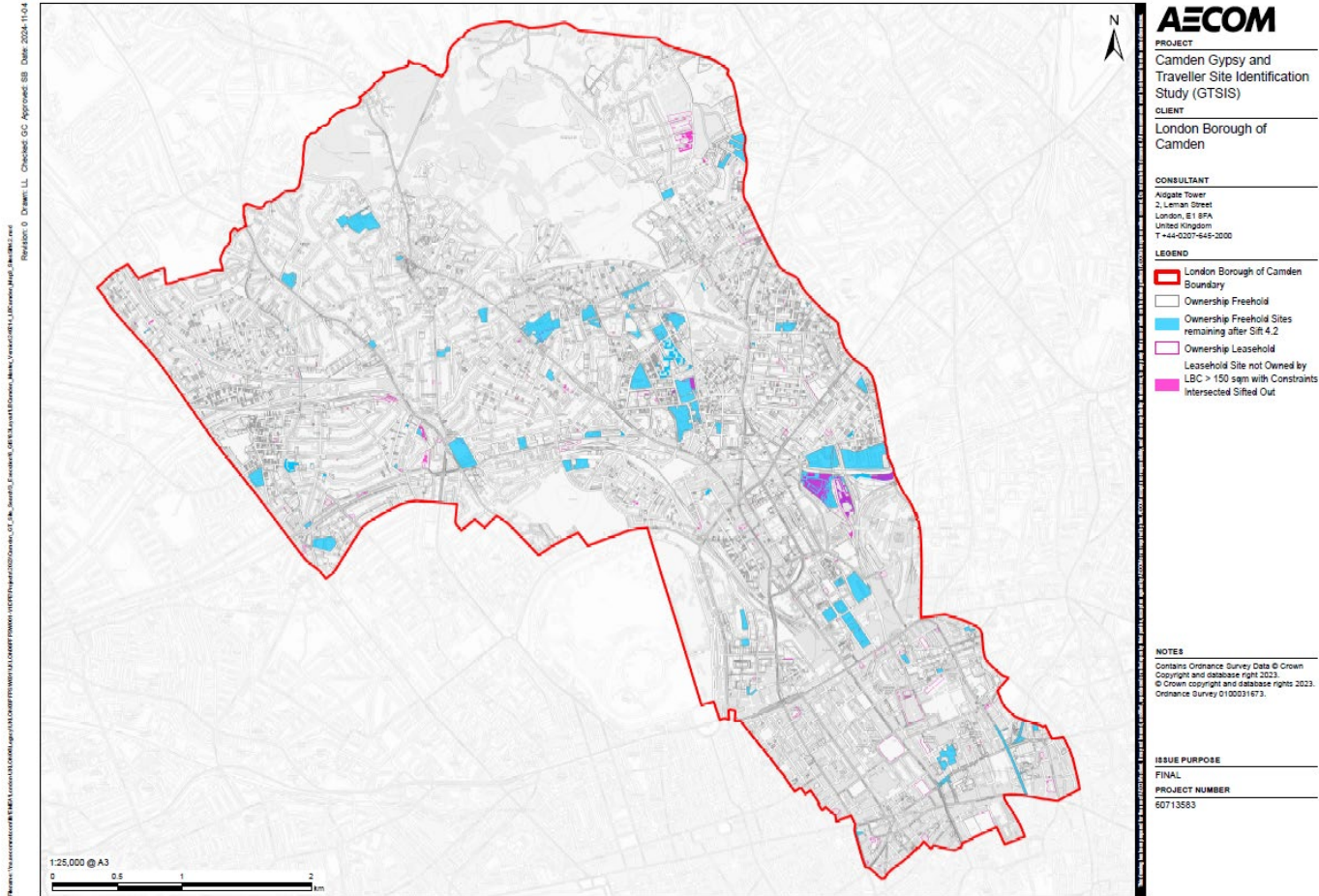
Ownership Freehold Unique AECOM ID	Title Number	Address Reference provided by Camden Council	Site Location	Area of Shortlisted Land Parcel(s) (sqm)	Total Freehold Title Area (sqm)	Site Commentary
2771	NGL715747	Caversham Road and Islip Road Estates	Frideswide Place, NW5 2AA	380.05	1086.50	<p>Current use of site comprises car parking area to the rear of commercial and residential mixed use buildings on Kentish Town Road, off Frideswide Place. If allocated, alternative arrangements for current uses would need to be considered. Loss of parking may impact on operation of employment and retail uses on Kentish Town Road.</p> <p>Constraints include: Potential for overlooking from residential flats to the west of the site; location within an archaeological priority area; and location close to a railway with potential noise impact.</p>

# Appendix C– Maps of Shortlisted Sites after each Sifting Stage

## Sites remaining after Sift 4.1

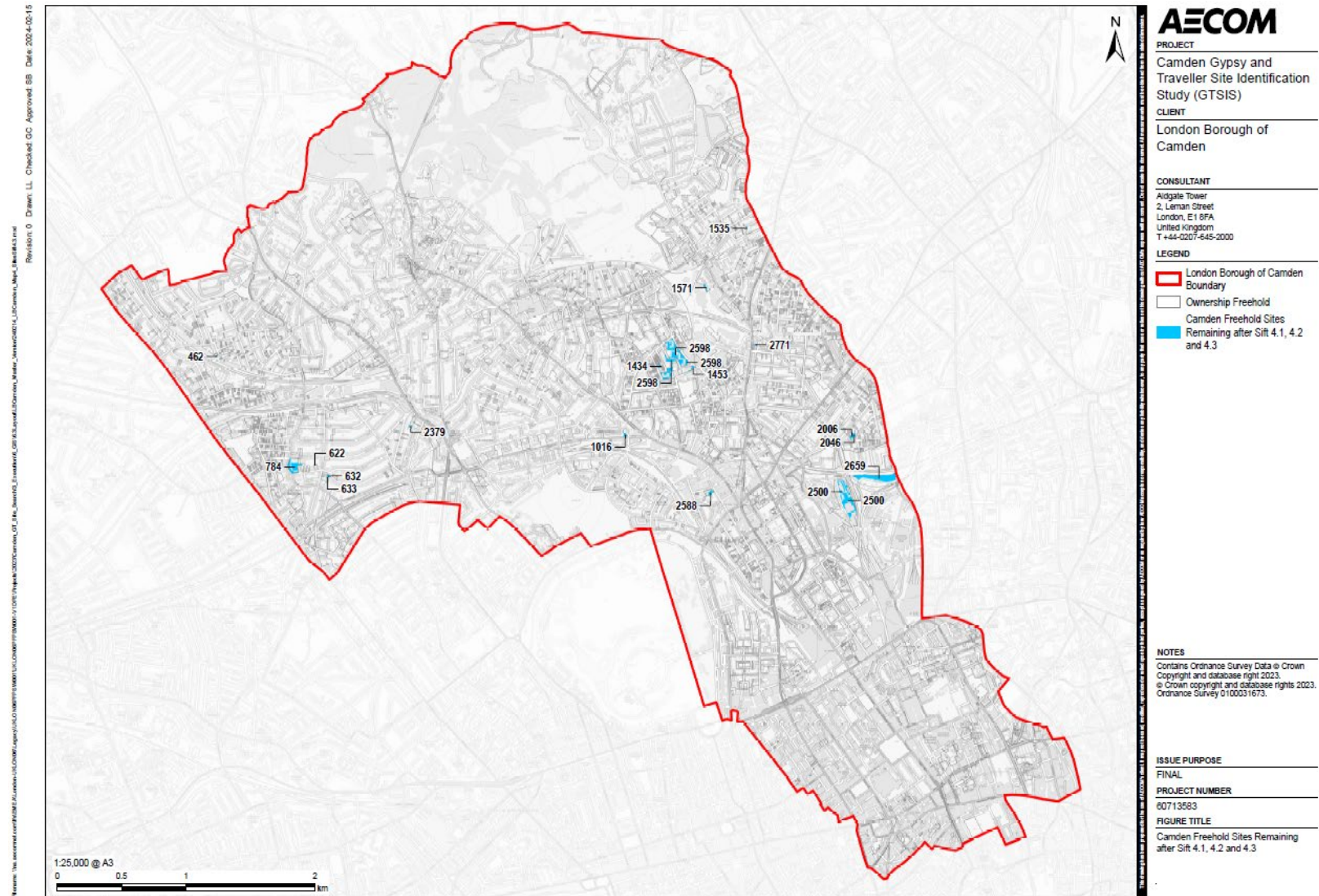


## Sites remaining after Sift 4.1 and 4.2

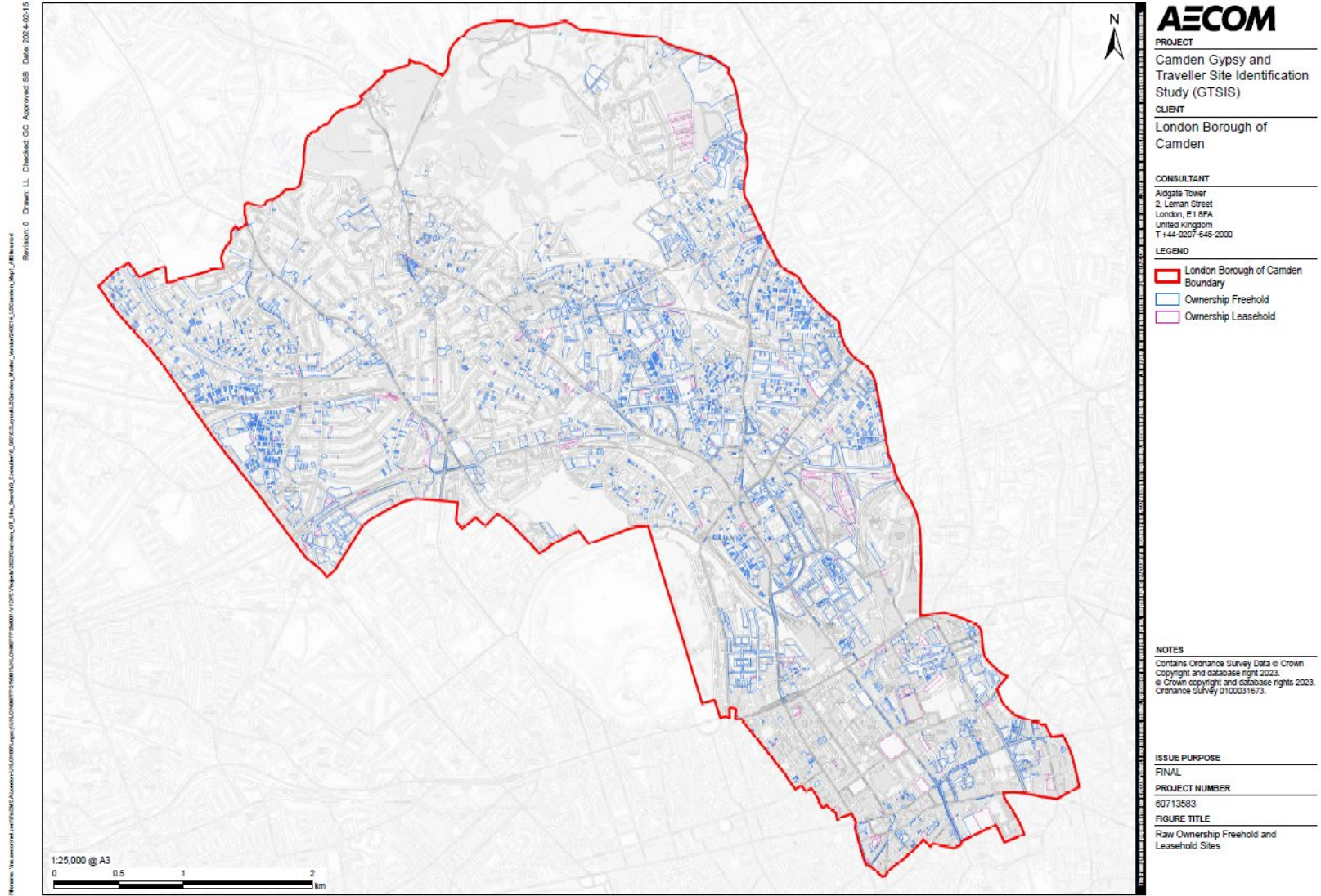




## Sites remaining after Sift 4.1, 4.2, and 4.3 – Final Shortlist of Sites



# Appendix D – Map of all Sites Assessed





## Appendix E – Policy, Guidance & Context Review

3.14 AECOM's approach to GTSIS has had full and demonstrable regard to the relevant national, regional, and local legislation, policy, guidance, and other relevant planning considerations including local context, as far as has been possible within the scope of the study. The purpose of the below review of the relevant policy and context is to underpin GTSIS, as well as aiding LBC's subsequent more detailed assessment and engagement.

3.15 The key documents and matters taken into account when assessing sites for potential suitability as Gypsy and Traveller accommodation include the following:

- Current community and provision in the borough;
- National Planning Policy Framework (NPPF 2023);
- Government's Planning Policy for Travellers Sites (PPTS) 2023;
- National Guidance on Designing Gypsy and Traveller Sites (2008, withdrawn 2015);
- Camden's adopted Local Plan 2017;
- Camden's Article 4 Directions;
- Made Neighbourhood Plans in Camden;
- Camden's draft new Local Plan 2024;
- Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014;
- Camden Planning Guidance on Amenity 2021;
- Camden's New Homes for Small Sites Programme;
- London Plan 2021;
- Emerging London Gypsy and Traveller Accommodation Needs Assessment;
- Recent relevant judgement *Smith v Secretary of State for Levelling Up, Housing and Communities* [2022] EWCA Civ 1391;
- Relevant recent Local Plan Inspector's letters on the subject of addressing Gypsy and Traveller Accommodation Need; and
- Appropriate guidance and case studies provided by relevant bodies, such as Planning Advisory Service and London Gypsies and Travellers.

### Current provision, context, and activity

3.16 Camden has an established community of Gypsy and Traveller households, of which a small proportion live on designated sites, while the remainder live in undesignated, conventional housing.

- 3.17 The 2011 Census<sup>11</sup> identified a total of 167 Camden residents with the ethnicity of Gypsy / Traveller / Irish Traveller. The 2011 Census further identified 87 households for whom the household reference person had an ethnicity of White: Gypsy or Irish Traveller<sup>12</sup>.
- 3.18 Detailed 2021 Census ethnic group data (Ethnic group, England and Wales: Census 2021<sup>13</sup>) identified 128 White - Gypsy or Irish Traveller residents, 978 White - Roma residents, and 5 residents who had stated their ethnic group as Other Ethnic Group - Gypsy/Romany. Note that the Roma category was added newly for the 2021 Census and identifies a significantly larger population than previous Censuses under the earlier Gypsy / Traveller / Irish Traveller ethnic category. Note that at the time of writing this report, 2021 Census tables on the ethnicity of household reference persons were not yet published.
- 3.19 Two current designated Gypsy and Traveller sites in Camden (both opened in 1992), are both Council-owned, providing a total of 4 residential pitches and a caravan capacity of 4. A third, privately owned, site for Travelling Showpeople exists at the Vale of Health. No transit pitches are located in the borough at present.
- 3.20 The two Council owned sites are small sites (approximately 188 and 444 square metres respectively) close to existing residential properties, with one pitch located in Kentish Town on Castlehaven Road, directly adjacent to a terraced property, and other pitches on Carol Street in Camden Town again located next to terraced houses and a small park (see Figure 1):
- Castlehaven Road site: Approximately 188 square metres and
  - Carol Street site: 444 square metres.

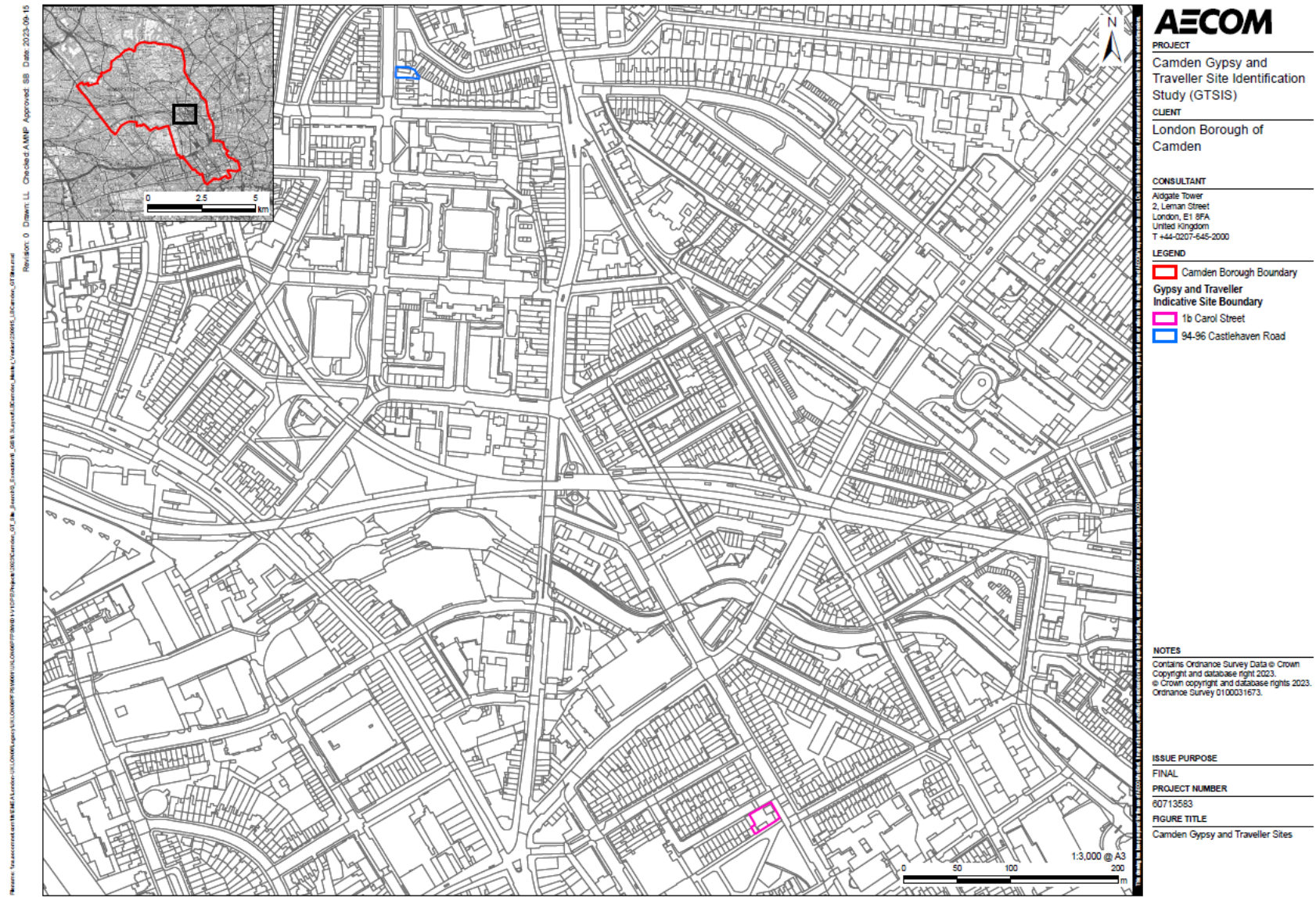
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<sup>11</sup> Census 2011 Table KS201UK - Ethnic group

<sup>12</sup> Census 2011 Table DC1201EW - Household composition by ethnic group of Household Reference Person

<sup>13</sup> [Ethnic group \(detailed\) - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-population/ethnicity)

**Figure 1: The two existing Council-owned Traveller sites in Camden**





## National Planning Policy Framework (NPPF) 2023

- 3.21 Paragraphs 60-63 of the NPPF set out how strategic policies should plan for sufficient amount and variety of land to come forward where needed, to address needs of groups with specific requirements, including Travellers.
- 3.22 NPPF footnote 28 refers to the Planning Policy for Traveller Sites, which sets out how Travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document. More information on this definition is included below.
- 3.23 NPPF paragraphs 69-77 detail how strategic policy making authorities should identify land for accommodation, including Traveller pitches, and maintain an appropriate supply and delivery of sites. A supply of specific deliverable sites, sufficient to provide a minimum of five years' worth of housing against their requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old, should be identified and updated annually. NPPF footnote 41 clarifies that the five year supply of deliverable sites for Travellers, again as defined in Annex 1 to Planning Policy for Traveller Sites, should be assessed separately from the local authority's remaining five year housing land supply.
- 3.24 NPPF section 13 sets out national policy around green belt protection, including
- the five purposes of the green belt (paragraph 143);
  - that once established Green Belt boundaries may only be altered where exceptional circumstances are fully evidenced and justified through a Plan (paragraph 145);
  - before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the LPA should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (paragraph 146);
  - when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account; first consideration should be given to land which has been previously developed and is well served by public transport; and ways should be set out for offsetting the impact of removing land from the Green Belt through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (paragraph 147); and
  - finally paragraph 148 sets out criteria to be considered for defining Green Belt boundaries.
- 3.25 NPPF paragraph 152 states clearly that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Inappropriate development includes Traveller sites as per the Government's Policy for Travellers Sites (see below). Exceptions to inappropriate development in the Green Belt are set out in NPPF paragraphs 154-155.
- 3.26 Green Belt protection equally applies to MOL (as set out in the London Plan, summarised below).

3.27 Note that national government is consulting on further revisions to the NPPF<sup>14</sup> at the time of writing this report. LBC should therefore monitor any proposed changes with relevance to GTSIS.

## Government's Planning Policy for Travellers Sites (PPTS) 2023

3.28 The 2023 PPTS sets out the broad prescriptive requirements for identifying suitable sites for the provision of Gypsies and Travellers, with the key objective of ensuring that sites are sustainable economically, socially, and environmentally.

3.29 The PPTS 2023 states that 'local planning authorities should make their own assessment of need for the purposes of planning' and 'ensure that their Local Plan includes fair, realistic and inclusive policies'. Government aims to 'increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply'.

3.30 Policy A of the 2023 PPTS relates to evidence needed to plan positively and manage development, stating that 'in assembling the evidence base necessary to support their planning approach, local planning authorities should:

- pay particular attention to early and effective community engagement with both settled and Traveller communities (including discussing Travellers' accommodation needs with Travellers themselves, their representative bodies and local support groups);
- co-operate with Travellers, their representative bodies and local support groups; other local authorities and relevant interest groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and
- use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.

3.31 Policy B of the PPTS further requires Local Plans to:

- be prepared with the objective of contributing to the achievement of sustainable development and consistent with the policies of the NPPF; and
- set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.

3.32 Policy B (paragraph 10) sets out that local authorities, in producing their Local Plan, should:

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;

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<sup>14</sup> [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system)

- identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints (local planning authorities have a Duty to Cooperate on planning issues that cross administrative boundaries);
- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
- protect local amenity and environment.

3.33 It is currently anticipated that targets will be set on the basis of the emerging London-wide GTANA prepared by the Mayor.

3.34 In line with Policy B (paragraph 13), local authorities should ensure that Traveller sites are sustainable economically, socially, and environmentally and ensure that relevant policies:

- promote peaceful and integrated co-existence between the site and the local community;
- promote, in collaboration with commissioners of health services, access to appropriate health services;
- ensure that children can attend school on a regular basis;
- provide a settled base that reduces both the need for long-distance Travelling and possible environmental damage caused by unauthorised encampment;
- provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any Travellers who may locate there or on others as a result of new development;
- avoid placing undue pressure on local infrastructure and services;
- do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- reflect the extent to which traditional lifestyles (whereby some Travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

3.35 Policy E on Traveller Sites in the Green Belt sets out that Traveller sites are inappropriate development on green belt (and thus also Metropolitan Open Land (MOL), which, in line with the London Plan (see also below) is afforded the same level of protection as Green Belt. An amendment of the Green Belt or MOL boundary would be required by LBC, in consultation with the Mayor (in line with London Plan policy G3 on MOL), if allocation of such a site were considered:

*“Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the*

*best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.*

*Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a Traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a Traveller site only”.*

- 3.36 On the subject of unauthorised encampments, PPTS paragraph 12 clarifies that in exceptional cases, where a local authority is burdened by a large-scale unauthorised site that has significantly increased their need, and their area is subject to strict and special planning constraints, then there is no assumption that the local authority will be required to meet their Gypsy and Traveller site needs in full. The intention is to protect local planning authorities with significant land constraints from a requirement to provide in full for additional needs arising directly from large unauthorised sites. At the time of writing LBC are not aware of any unauthorised encampments in the borough.
- 3.37 PPTS Annex 1, paragraph 1, as mentioned above, sets out a definition of Gypsies and Travellers for the purposes of planning policy as ‘Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.’
- 3.38 The definition of ‘Travelling Showpeople’ in PPTS Annex 1 para 3 is ‘Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.’ Finally, the Annex states in paragraph 4 that ‘For the purposes of this planning policy, “Travellers” means “Gypsies and Travellers” and “Travelling Showpeople” as defined above’.
- 3.39 PPTS also defines further relevant terms as follows: ‘For the purposes of this planning policy, “pitch” means a pitch on a “Gypsy and Traveller” site and “plot” means a pitch on a “Travelling Showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “Gypsies and Travellers” and mixed-use pitches for “Travelling Showpeople”, which may/will need to incorporate space or to be split to allow for the storage of equipment.’
- 3.40 A further part of PPTS which is relevant to the GTSIS is Policy F on Mixed planning use Traveller sites, which states in paragraphs 18-19 that
- ‘Local planning authorities should consider, wherever possible, including Traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring

residents. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practical.

- Local planning authorities should have regard to the need that Travelling Showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment’.

## Designing Gypsy and Traveller Sites

3.41 This Good Practice Guide, published by the former Communities and Local Government (now DLUHC) in 2008 and withdrawn in 2015<sup>15</sup>, was intended to help local authorities and providers of affordable housing who wish to develop or refurbish a site, private developers or architects working with site developers, and people who will be living on a site and are participating in its design. No government replacement guidance has been issued at the time of writing.

3.42 While having been withdrawn, this 2008 guidance document still contains a variety of useful guidance which can be taken into account when designing sites, including on the subjects of site location and selection, site layout and orientation, site services and facilities, health, safety and accessibility, and individual pitches, in relation to permanent sites. It also discusses transit sites and temporary stopping places.

3.43 The most relevant elements applying to our higher level site identification study relate to site location and selection, and the size of sites and pitches. In terms of location and selection of sites, the withdrawn guidance states that this should include consideration of:

- that sites should be near to housing for the settled community as part of mainstream residential developments;
- that sites should have characteristics which are sympathetic to the local environment;
- relationship to surrounding land uses;
- scope to provide essential services including mains water, electricity supply, drainage, and sanitation;
- means of access, availability of transport modes and distances from services;
- integrated co-existence between the site and local community;
- easy access to General Practitioner and other health services;
- proximity to a bus route, shops and schools;
- easy access to major roads or public transport services;
- visual and acoustic privacy (considering the greater noise transference through the walls of trailers and caravans);

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<sup>15</sup> <https://www.gov.uk/government/publications/designing-gypsy-and-traveller-sites-good-practice-guide>

- when considering sites adjacent to main roads, flyovers and railway lines, careful regard must be given to the health and safety of children and others who will live on the site;
- ground conditions and levels of land (with sites preferably relatively flat and suitable for purpose, not on exposed sloping sites);
- the relatively high density of children likely to be on the site;
- not using sites inappropriate for ordinary residential dwellings, unless exceptional circumstances apply;
- not locating sites on contaminated land;
- not locating sites in areas of high flooding risk; and
- not situating sites near refuse sites, industrial processes or other hazardous places.

3.44 In terms of size site, the withdrawn guidance does not state any strict thresholds but states the following considerations:

- experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage;
- smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family;
- for practical reasons, caravan sites require a greater degree of land usage per household than for smaller houses;
- sites should be designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking;
- where possible, circular or horseshoe designs are often preferred rather than the more traditional linear layout of pitches;
- in terms of size of individual pitches, the guidance notes that in common with some other ethnic minority communities, some Gypsies and Travellers often have larger than average families, for instance where members of an extended family live together. For this reason there is likely to be much greater demand amongst these communities for large family units, and small pitches may become quickly overcrowded;
- larger than average family sizes, alongside the need for vehicles for towing trailers and for employment also creates particular requirements for parking;
- as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc), parking space for two vehicles and a small garden area;
- Smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle).

## Camden Adopted Local Plan 2017

- 3.45 The Camden Local Plan 2017 committed LBC to identify sites to meet or exceed the need for 16 additional Traveller pitches identified in the Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014 (see also below). Since the adoption of the Local Plan in 2017 there have been no planning applications submitted for potential Traveller sites and no sites have been allocated or submitted for future allocation.
- 3.46 It is anticipated that 2017 needs figures will all be updated as part of the London-wide GTANA.

### **Adopted Local Policy H11 Accommodation for Travellers**

*The Council will aim to secure a sufficient supply of pitches/ plots to meet the existing and future needs of Camden's established Traveller community. We will protect existing lawful sites, plots and pitches for Travellers. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, pitches and/or plots in suitable locations, or are demonstrably no longer needed. We will identify deliverable sites to meet or exceed Camden's projected need for seven additional pitches for the established Traveller community by 2020/21 and seek to identify developable sites or broad locations to meet Camden's projected need for a further nine additional pitches by 2030/31.*

*New sites, pitches and/or plots for Travellers should:*

- a. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;*
- b. be capable of connection to energy, water and sewage infrastructure;*
- c. provide safe access to and from the main road network;*
- d. support the health and wellbeing of the occupiers;*
- e. provide an appropriate layout and facilities;*
- f. be attractive and of the highest design quality; and*
- g. protect local amenity and the environment.*

- 3.47 Other policies which are specifically relevant to our sift include:

- A2 – Open Space;
- A3 – Biodiversity;
- D2 – Heritage; and
- TC2 – Camden's centres and other shopping areas.

## Article 4 Directions

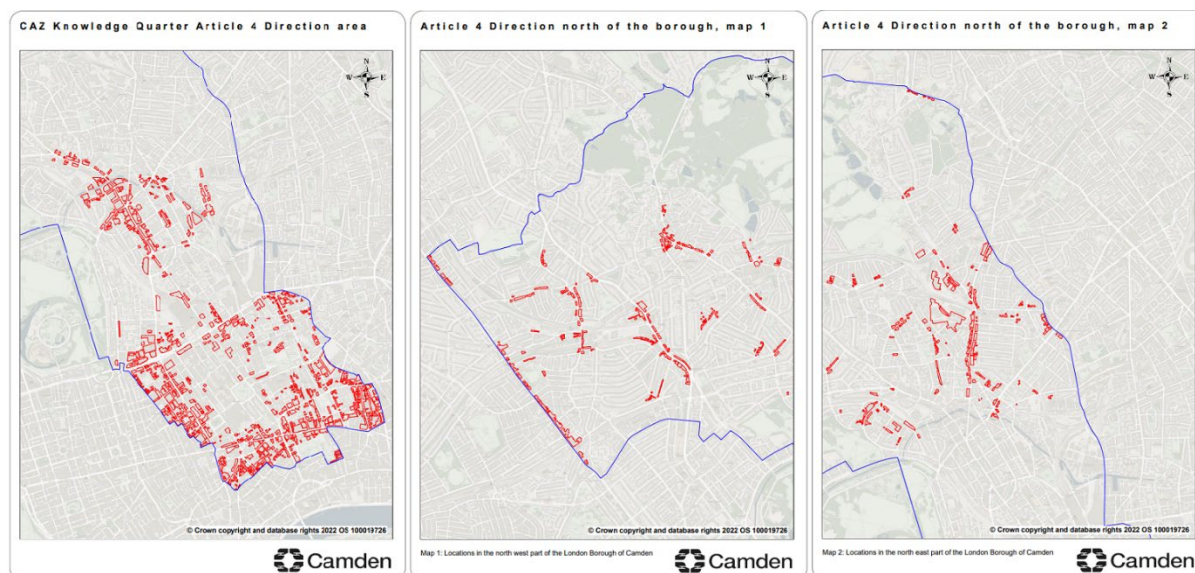
- 3.48 Camden's Article 4 Directions on Land Use Classes remove permitted development rights for change of use from Use Class E (Commercial,



Business, and Service) to Use Class C3 (dwellinghouses)<sup>16</sup> in specific areas to which the Direction applies<sup>17</sup>.

3.49 This means that in these areas (including the Knowledge Quarter and the Central Activity Zone, and in parts of the North of the borough, shown in Figure 2 below), Policy TC2 continues to protect town centre uses, particularly at ground flood level, to ensure the town centre function is not prejudiced.

**Figure 2: Article 4 Direction on Land Use Classes – Applicable Area Maps**



Source: LBC<sup>18</sup>

## Made Neighbourhood Plans in Camden

3.50 LBC, at the time of writing, contains thirteen areas and forums which either have a made Neighbourhood Plan or are working on developing such a plan, with coverage shown in the map overleaf.

3.51 Each of the made Neighbourhood Plans forms part of the statutory development plan within their designated Neighbourhood Area. Neighbourhood Plan policies should be considered alongside Local Plan policies when sites are considered in more detail by LBC, following GTSIS production of a shortlist of potentially suitable sites.

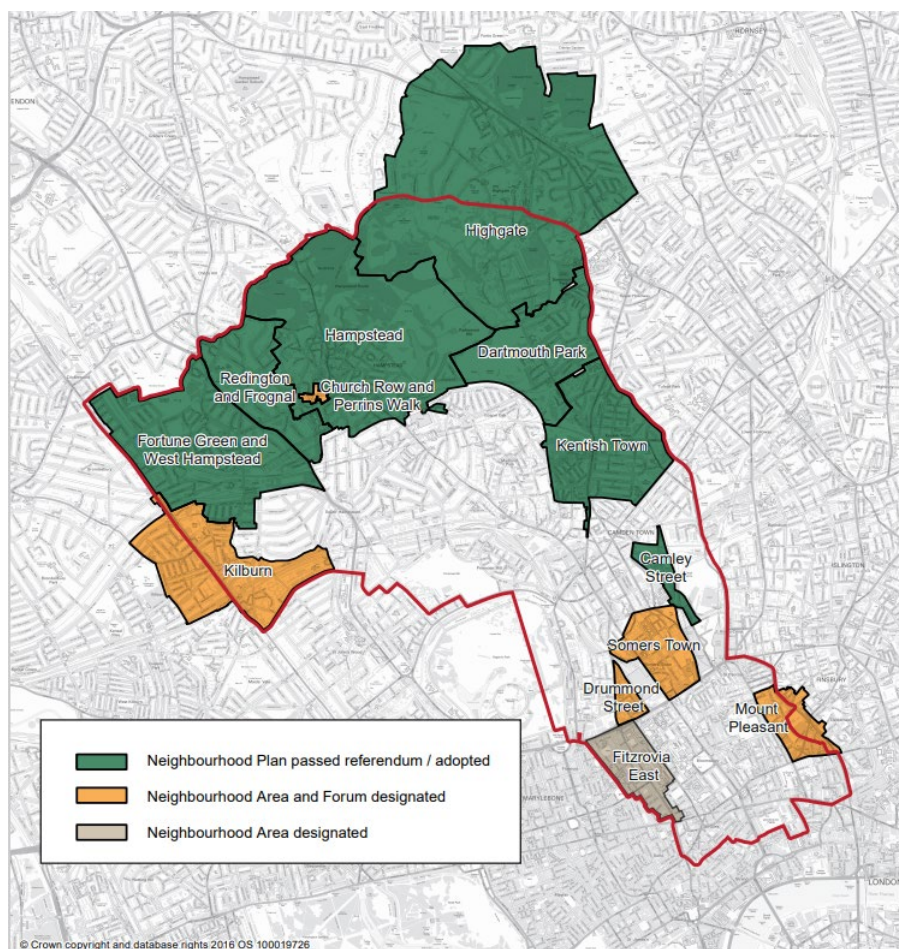
<sup>16</sup> [When is permission required? - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>17</sup> [Article 4 Directions Land Use Classes - Camden Council](#)

<sup>18</sup> [Article 4 Directions Land Use Classes - Camden Council](#)



**Table 2: Coverage of Camden Neighbourhood Plans and Neighbourhood Areas**



Source: LBC<sup>19</sup>

## Camden Emerging Local Plan

3.52 LBC is currently reviewing the adopted 2017 Camden Local Plan. To inform the development of the draft new Local Plan, LBC held a Call for Views from November 2022 to January 2023, which included a Call for Sites, and a specific call for Gypsy and Traveller sites. No Gypsy and Traveller sites were submitted for consideration.

3.53 The Council have recently published a Regulation 18 draft new Local Plan for consultation. The draft Local Plan also incorporates the site allocations from the 2020 draft site allocations local plan. When adopted, the new Local Plan will supersede the 2017 Local Plan and the 2013 Site Allocations Plan.

3.54 Whilst the draft new Local Plan doesn't currently allocate sites for Gypsy or Traveller pitches, the availability of some sites may be affected by alternative allocations. Where the latest list of proposed site allocations shared with AECOM by LBC overlaps with the sites identified as part of GTSIS, this is flagged as a secondary constraint, unless work has already commenced, in which case the site is excluded on these grounds.

<sup>19</sup> [Neighbourhood Planning August 2021 \(camden.gov.uk\)](https://www.camden.gov.uk/neighbourhood-planning-august-2021)

## Camden's Community Investment Programme

- 3.55 Camden's Community Investment Programme (CIP) includes schemes which invest in local schools, homes and community facilities in Camden. In September 2022 LBC committed to expanding the Programme particularly to increase the numbers of social and affordable homes by 4,850 new homes, including 1,800 council homes; and 350 Camden Living Rent homes for nurses, teachers, keyworkers and other middle-earners. The CIP also includes investment in schools, children's centres, and other community facilities. The CIP does not at present include plans to build Gypsy and Traveller pitches but may affect the availability of some sites if they are sites where CIP investment is taking place to provide housing or community facilities.
- 3.56 Camden's New Homes for Small Sites Programme as part of CIP<sup>20</sup>, which launched in October 2023, focuses specifically on exploring development opportunities on underused council-owned land, to deliver new affordable homes for local people. At the time of writing, the CIP has identified five sites for development and other sites for possible disposal. Development sites are at the stage of commencing design and working towards a planning application in 2024. More sites are being explored for a future CIP pipeline but are not sufficiently advanced to be defined. Where more advanced sites in the public domain as being considered for CIP overlap with sites the GTSIS identified, this is flagged as a secondary constraint but sites are not excluded on this basis. Sites are only excluded where a CIP related planning application is already being implemented at the time of writing.
- 3.57 LBC Planning Team should continue to work with the LBC Housing Team, to ensure relevant opportunities and information are shared when conducting further site assessment following the conclusion of GTSIS. Note that some sites may be more or less suitable for development as Gypsy and Traveller sites than other housing and vice versa. Where sites are equally suitable, a strategic decision may have to be taken by LBC.

## Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014

- 3.58 As referenced in the Local Plan, the Council-commissioned needs assessment produced in 2014 (based on the 2012 national planning policy for Traveller's sites) indicated a need for 16 additional pitches up to 2031. This included ten additional pitches to meet the needs of concealed households and existing households on the waiting list, and a further six additional pitches to meet anticipated growth in the number of households.
- 3.59 Some issues were also raised related to overcrowding on an existing site, arising from formerly accommodating 4<sup>21</sup> pitches on approx. 450 sqm of land at Camden Street.
- 3.60 The Accommodation Assessment also considered the need for transit sites for Travellers who are visiting or passing through an area, and the needs of

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<sup>20</sup> [Camden's New Homes for Small Sites Programme launches - CIP - Camden Council](#)

<sup>21</sup> Note that the number of pitches has since been reduced to reflect the modest site size.

Travelling Showpeople, but concluded that there was, at that time, no evidence of need for a transit site and that two of the existing plots for Travelling Showpeople are unoccupied and there is no evident need for additional plots.

## Camden Planning Guidance (CPG) on Amenity (2021)

- 3.61 This document is a formal Supplementary Planning Document (SPD) and therefore a “material consideration” in planning decisions, while not containing planning policies, and thus needs to be read in conjunction with the Local Plan. It provides guidance and information on key amenity issues within Camden in relation to managing the impact of development on overlooking, privacy and outlook; daylight and sunlight; artificial light; Construction management plans; noise and vibration; wind and micro-climate; and contaminated land.
- 3.62 Paragraphs 2.2-2.10 discuss overlooking and privacy, and the impact on the quality of life of occupants, stating that “To ensure privacy, it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties directly facing the proposed (either residential or non-residential) development, assuming a level topography. In instances where building heights, design or topography mean that opportunity for overlooking would be increased, it is advisable to increase this separation distance. The 18m should be measured between the two closest points on each building (including balconies)... Where there is an existing street or public space, this space is considered to already provide an adequate separation between properties and so the 18m guideline will not apply. However, care should be taken to reduce overlooking from the street into habitable rooms near to a street or public space, particularly bedrooms. ... There may also be instances however, where the historic character of the immediate area is composed of buildings positioned less than 18m apart and it will be appropriate to reflect this in the design of development schemes. ... There may be circumstances where a separation distance of 18m cannot be achieved. In these instances, mitigation measures should be incorporated to ensure overlooking is reduced to an acceptable level”.
- 3.63 In the case of Gypsy and Traveller accommodation it is worth bearing in mind that accommodation may be designed differently from other housing, and that outdoor space, more prone to overlooking, is likely to be used more. A similar principle was applied in the Islington Local Plan Gypsy and Traveller Site Search in 2022<sup>22</sup>. While the Islington study does not go into further detail, the key assumption relating to GTSIS is that external amenity space is used for a greater amount of routine social and employment related interactions by occupiers of Gypsy and Traveller Accommodation, and this may make occupiers more sensitive to the issue of overlooking. This is a matter backed up by government guidance on Designing Gypsy and Traveller Sites, which states in its paragraph 4.14 that “As with housing for the settled community, site layout and design should ensure a degree of privacy for individual households (for instance by ensuring that neighbours cannot directly overlook each other’s living quarters), but without inhibiting the important sense of community”.

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<sup>22</sup> [Local Plan Gypsy and Traveller Site Search process update June 2022 \(islington.gov.uk\)](https://www.islington.gov.uk)

## London Plan 2021

3.64 The London Plan 2021 Policy H14 states that:

### Policy H14 Gypsy and traveller accommodation

- A Boroughs should plan to meet the identified need for permanent gypsy and traveller pitches and must include ten-year pitch targets in their Development Plan Documents.
- B Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for gypsy and traveller accommodation provided in [Table 4.4](#) as identified need for pitches until a needs assessment is undertaken as part of their Development Plan review process.
- C Boroughs that have undertaken a needs assessment since 2008 should update this as part of their Development Plan review process.
- D Boroughs should undertake an audit of existing local authority provided gypsy and traveller sites and pitches, working with residents occupying these, identifying:
  - 1) areas of overcrowding
  - 2) areas of potential extra capacity within existing sites
  - 3) pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping).
- E Boroughs should plan to address issues identified in the audits.
- F Boroughs should actively plan to protect existing gypsy and traveller and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.

3.65 Table 4.4 of the London Plan, referred to in the policy, sets out borough level need for Gypsy and Traveller pitches from London Boroughs' Gypsy and Traveller Accommodation Needs Assessment March 2008 (midpoint need figure 2007-2017). For Camden this showed a need for 4 pitches.

3.66 London Plan Paragraph 4.14.1 states that 'Boroughs should actively plan for Gypsy and Travellers' accommodation needs and should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood'.

3.67 London Plan Paragraph 4.14.6 further states that where new Gypsy and Traveller pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.

3.68 A further relevant element of the London Plan 2021 is the definition of Gypsies and Travellers. The version included in the draft London Plan pre-examination had been changed at the insistence of the Examiner, by removing the ethnic definition of Gypsies and Travellers in favour of the one set out within the 2015



PPTS. However, the PPTS definition has since been amended, in December 2023, following a legal Judgement (see below). This amended December 2023 PPTS definition is the definition which is used by GTSIS as well as the emerging London-wide GTANA.

3.69 London Plan Policy G3 on Metropolitan Open Land (MOL) states in Part A that MOL is afforded the same status and level of protection as Green Belt and should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. Part C goes on to set out that “any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B”. Part B sets out 4 criteria as follows:

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

3.70 Other London Plan Policies relevant to our assessment include:

- GG2 – Making the Best Use of Land;
- S3 – Education and Childcare Facilities;
- S4 – Play and Informal Recreation;
- HC1 – Heritage conservation and growth;
- G4 – Open Space;
- G6 – Biodiversity and Access to Nature; and
- G8 – Food Growing.

## **Emerging London Gypsy, Roma Traveller Accommodation Needs Assessment**

3.71 The London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) will inform local and strategic policy development in housing and planning, including Local Plan development and cross-borough Planning Frameworks. It will provide Camden and other boroughs with consistent and robust up-to-date evidence on Gypsy and Traveller accommodation needs over the next 10 years, including by accommodation type, such as transit pitches.

3.72 The London GTANA is expected to support borough actions that help to meet the demonstrable need for an increased number of pitches across London, such as planned as part of Camden’s Local Plan review. At the time of writing, the GTANA is due for completion later in 2024.

## Judgement Smith v Secretary of State for Levelling Up, Housing and Communities [2022] EWCA Civ 1391

- 3.73 The Court of Appeal handed down a judgement on 31 October 2022. The case concerned a planning inspector's reliance on the definition of Gypsies and Travellers in Planning Policy for Traveller Sites introduced by the government in August 2015, which was found to be discriminatory.
- 3.74 Following the judgment in the Court of Appeal in the case of Smith v SSLUHC & Ors, the Government is reverting the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012, with this change applying from December 2023 for plan and decision making.

## Relevant recent Local Plan Inspector's letters

- 3.75 The recent Local Plan Inspector's letter to London Borough of Islington Council advised, on the subject of addressing Gypsy and Traveller Accommodation Need, that in light of the above mentioned 2022 Judgement, it was appropriate to assess need for Gypsy and Traveller pitches in line with the ethnic definition used in the pre-Examination London Plan, rather than the definition in the PPTS 2015. Note that since this Inspector's letter, government amended the PPTS in December 2023.

## Appropriate guidance and studies provided by relevant bodies

- 3.76 There are a number of useful documents providing additional guidance on Gypsy and Traveller accommodation and related planning matters. This includes resource provided by the Planning Advisory Service, such as their report "Spaces and Places for Gypsies and Travellers, How Planning Can Help"<sup>23</sup>; materials and online tools for Planning and Housing provided by London Gypsies and Travellers, including the 2016 reports on "Planning for the accommodation needs of Gypsies and Travellers in London" and "Best practice for assessing accommodation needs of Gypsies and Travellers"<sup>24</sup>; and Publications provided by Friends, Families & Travellers, including "Communications Guide for New Local Authority and other Socially Rented Traveller Sites" and "National Policy Advisory Panel: Places we're proud of"<sup>25</sup>, and their newest study "Kicking the can down the road: The planning and provision of Gypsy and Traveller sites in England 1960-2023"<sup>26</sup>.

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<sup>23</sup> [www.local.gov.uk/sites/default/files/documents/spaces-and-places-gypsies-e2f.pdf](http://www.local.gov.uk/sites/default/files/documents/spaces-and-places-gypsies-e2f.pdf)

<sup>24</sup> [www.local.gov.uk/sites/default/files/documents/spaces-and-places-gypsies-e2f.pdf](http://www.local.gov.uk/sites/default/files/documents/spaces-and-places-gypsies-e2f.pdf)

<sup>25</sup> [Policy & Publications - Friends, Families and Travellers \(gypsy-traveller.org\)](http://Policy%20&%20Publications%20-%20Friends,%20Families%20and%20Travellers%20(gypsy-traveller.org))

<sup>26</sup> [Kicking the can down the road: The planning and provision of Gypsy and Traveller sites in England 1960-2023 - Friends, Families and Travellers \(gypsy-traveller.org\)](http://Kicking%20the%20can%20down%20the%20road%3A%20The%20planning%20and%20provision%20of%20Gypsy%20and%20Traveller%20sites%20in%20England%201960-2023%20-%20Friends,%20Families%20and%20Travellers%20(gypsy-traveller.org))

# Appendix F – Shortlisted Sites - Details

## Site 462 - Land between 23 - 25 Ravenshaw Street, NW6 6NN



<b>Unique AECOM ID</b>	462
<b>Title Number</b>	167500
<b>Site Location</b>	Land between 23 and 25 Ravenshaw Street, NW6 6NN
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	197.55
<b>Site Commentary</b>	<p>Current use of site is small parking area between residential properties on Ravenshaw Street. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include potential for overlooking from habitable rooms in the adjacent properties and potential noise impact from railway to the west.</p>

## Site 622 - Land rear of 6-8 Acol Road, NW6 3AH



<b>Unique AECOM ID</b>	622
<b>Title Number</b>	362418 and 362490
<b>Site Location</b>	Land rear of 6-8 Acol Road, NW6 3AH
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	182.94
<b>Site Commentary</b>	<p>Current use of site comprises surface car parking to the rear of residential blocks. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include narrow single vehicle access from Acol Road and location within a Conservation Area. Land appears well concealed from views from habitable rooms by vegetation.</p>



## Site 632 - Land at St Mary's Mews, NW6 3RF (rear of 267 Goldhurst Terrace)



<b>Unique AECOM ID</b>	632
<b>Title Number</b>	62249
<b>Site Location</b>	Land at St Mary's Mews, NW6 3RF (rear of 267 Goldhurst Terrace)
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	333.18
<b>Site Commentary</b>	<p>Current use of site is parking and garages to rear of 267 Goldhurst Terrace. There may also be a refuse store for adjacent apartments located on this site, with potential need for refuse vehicle access. If allocated, alternative arrangements for current use would need to be considered. Site is immediately adjacent to another study site (Land at St Mary's Mews NW6 3RF – adjacent to 1 St Mary's Mews - AECOM ID 633) and could potentially be brought forward together.</p> <p>Constraints include location within a Conservation Area.</p>

## Site 633 – Land at St Mary's Mews, NW6 3RF (adjacent to 1 St Mary's Mews)



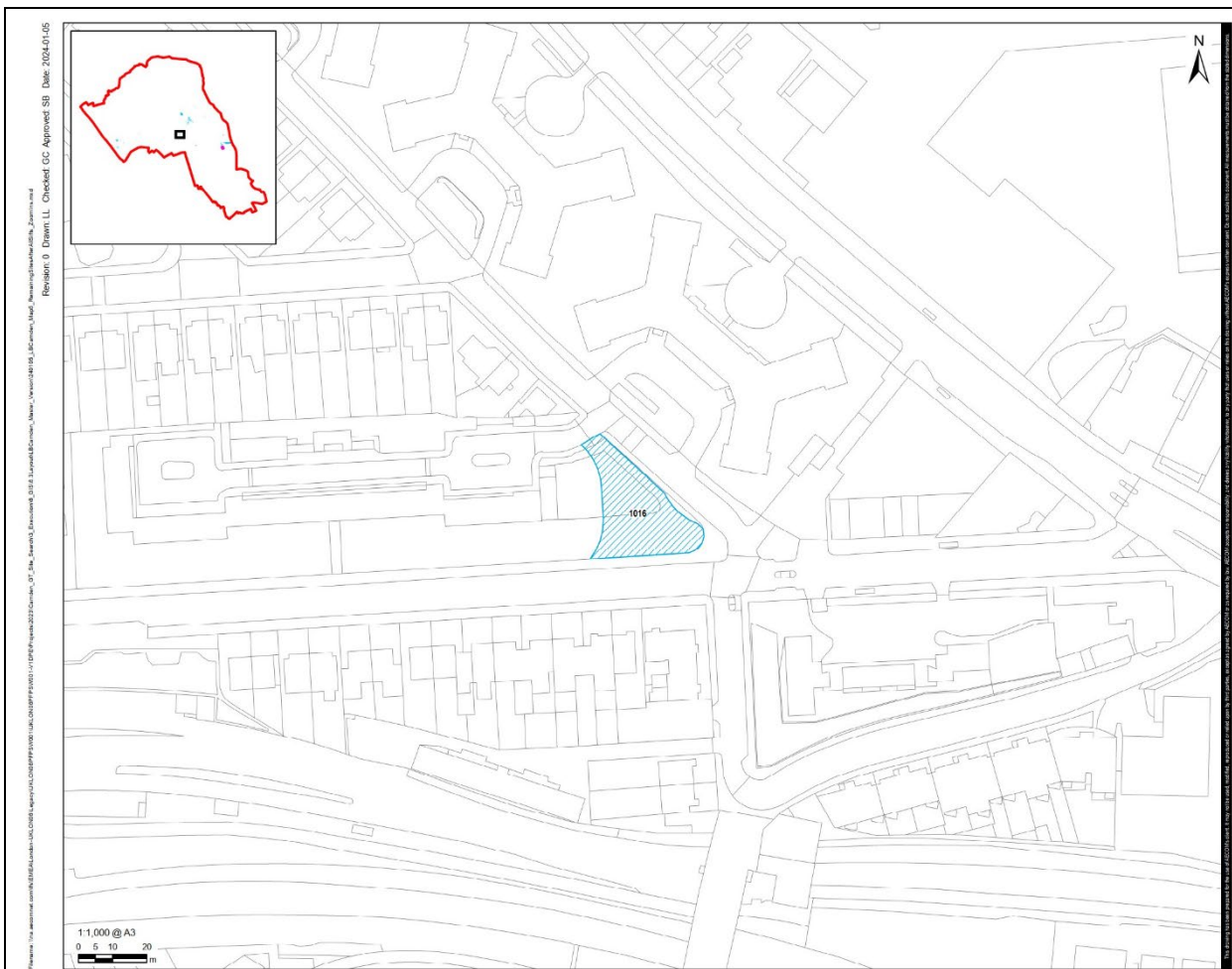
<b>Unique AECOM ID</b>	633
<b>Title Number</b>	NGL224688
<b>Site Location</b>	Land at St Mary's Mews, NW6 3RF (adjacent to 1 St Mary's Mews)
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	228.68
<b>Site Commentary</b>	<p>Current use of site comprises parking and garages accessed via St Mary's Mews. There may also be a refuse store for adjacent apartments located on this site, with potential need for refuse vehicle access. If allocated, alternative arrangements for current use would need to be considered. Site is located immediately adjacent to another study site (Land at St Mary's Mews – rear of 267 Goldhurst Terrace - AECOM ID 632) and could potentially be brought forward together. Due to its limited size, this site is less likely to be suitable without the neighbouring larger site.</p> <p>Constraints include location within a Conservation Area.</p>

## Site 784 – Land at Sidney Boyd Court, NW6 4QZ



<b>Unique AECOM ID</b>	784
<b>Title Number</b>	LN75251
<b>Site Location</b>	Land at Sidney Boyd Court, NW6 4QZ
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	5,724.54
<b>Site Commentary</b>	<p>Current use of site comprises land at Sidney Boyd Court (a Council residential block), including amenity open space, playgrounds, a MUGA, parking and garages. Constraints include location within a Conservation Area.</p> <p>Some of the site is unsuitable due to overlooking from blocks of 4-7 storeys to north, south and west of site, and the central part of the site area contains the playgrounds and MUGA. If allocated, alternative arrangements for current uses would need to be considered and site design should avoid overlooking.</p> <p>The eastern part of the site, accommodating parking and garages, appears to have greatest potential (between 26-28 Acol Road and 17-19 Woodchurch Road).</p>

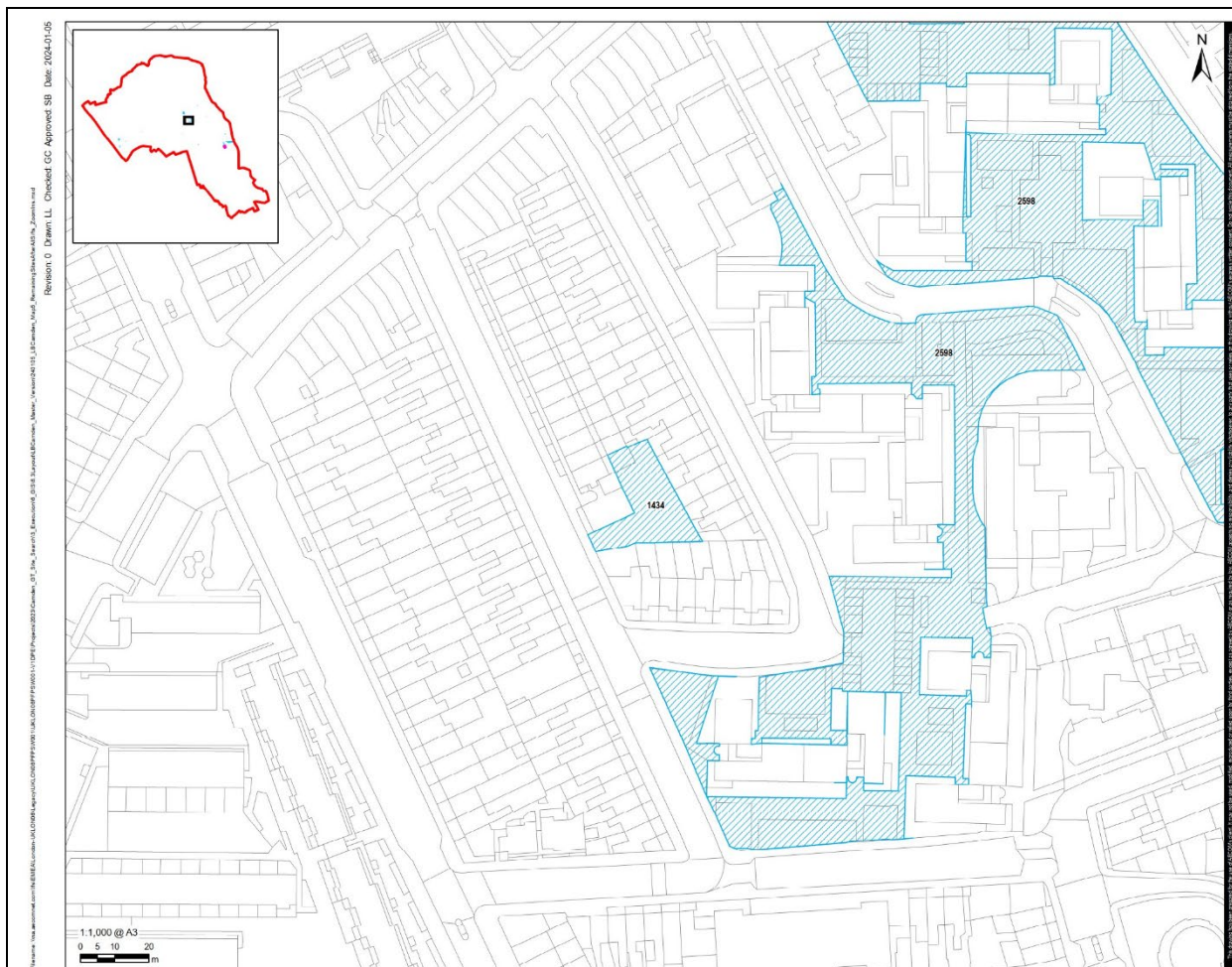
## Site 1016 - Land east of Constable House, NW3 3QA



<b>Unique AECOM ID</b>	1016
<b>Title Number</b>	NGL454800
<b>Site Location</b>	Land east of Constable House, NW3 3QA
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	661.22
<b>Site Commentary</b>	<p>Current use of site is an area of green space and hardstanding east of a residential block on the corner of Eton College Road and Adelaide Road.</p> <p>Constraints include potential for flooding (Adelaide Road was identified in Flood Streets 2021 data) and potential lack of privacy, depending on site intervisibility with residential block on opposite side of Eton College Road. The latter is partially mitigated by vegetation on the site boundary.</p>

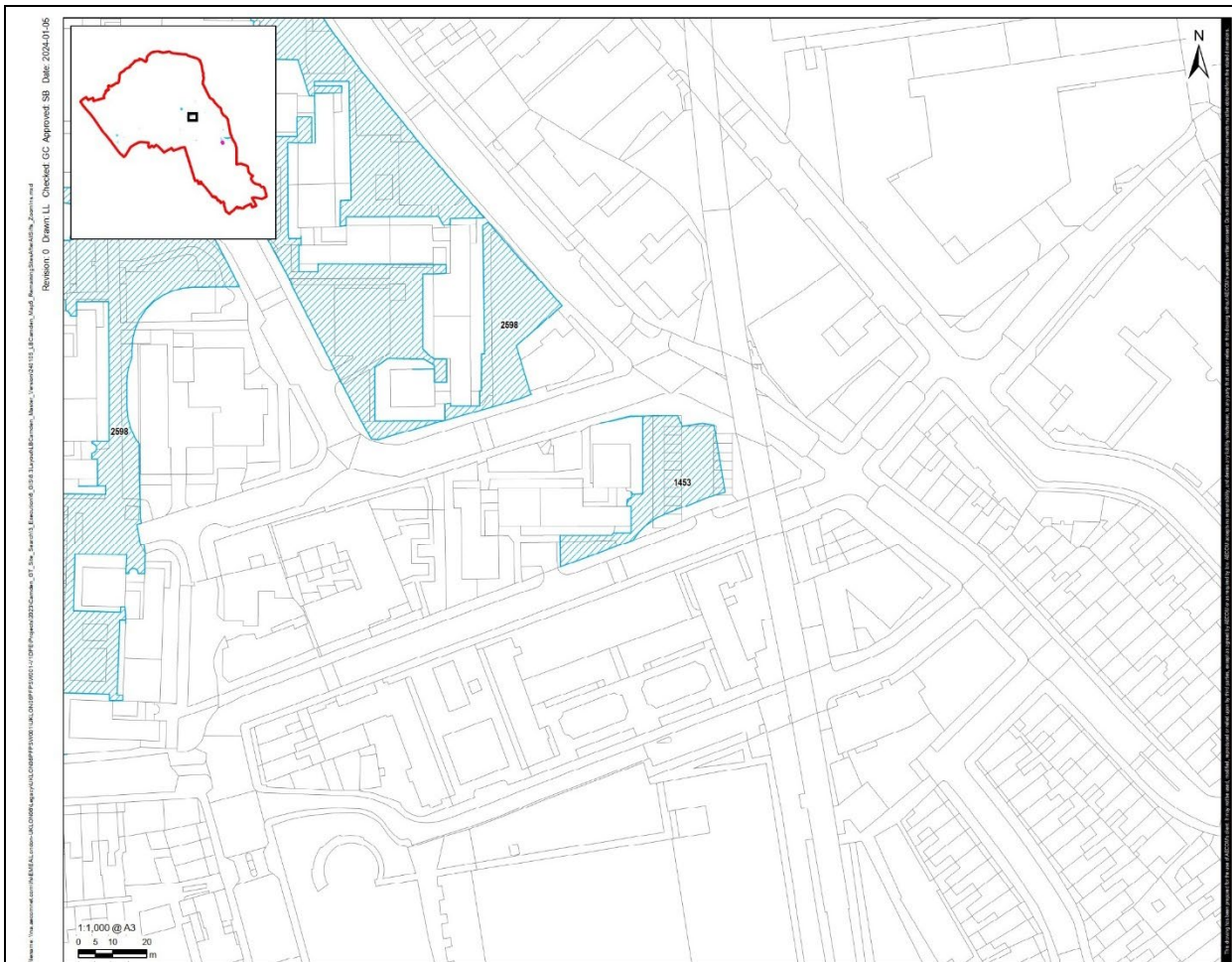


## Site 1434 - Land south of 60 Bassett Street, NW5 4PH



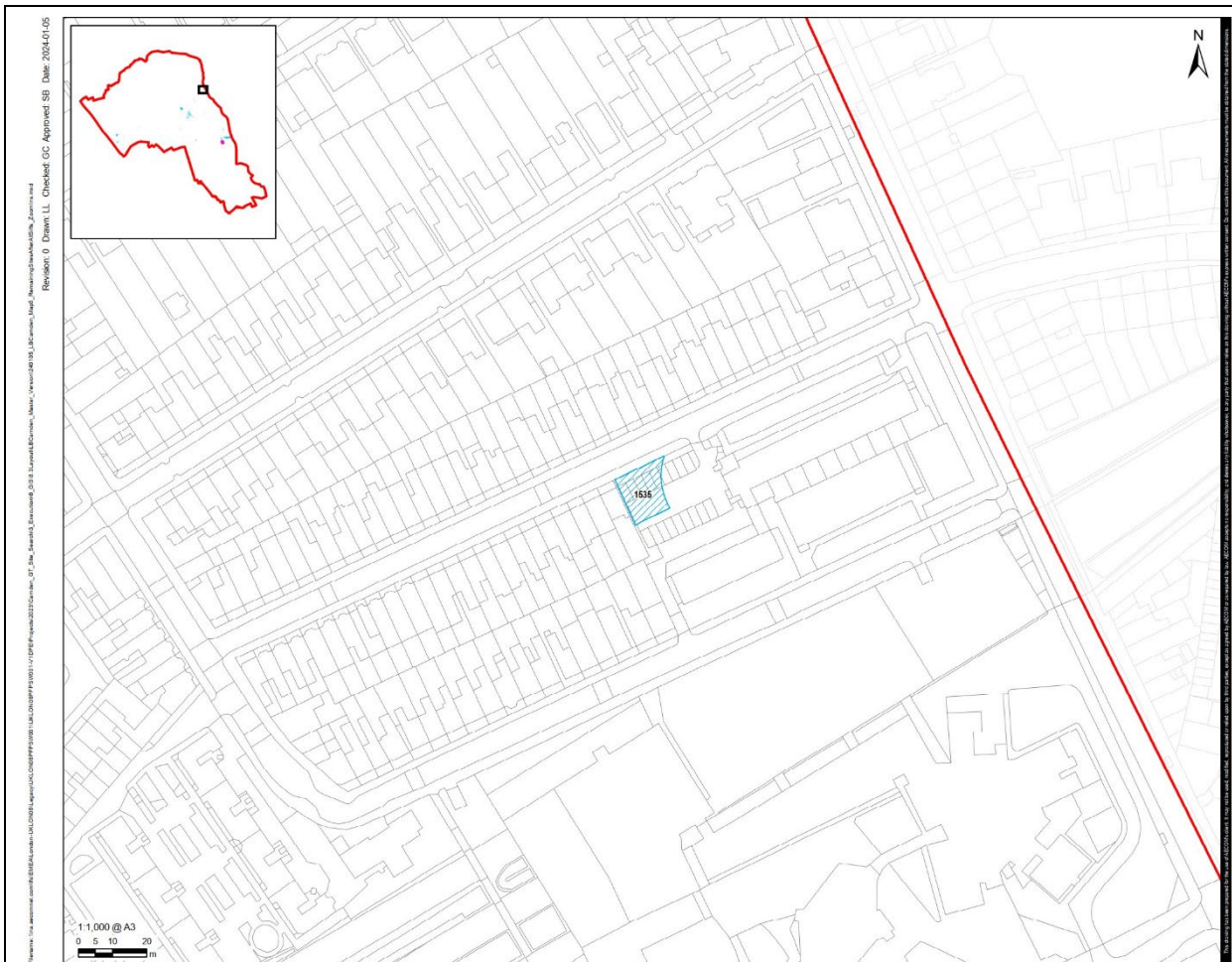
<b>Unique AECOM ID</b>	1434
<b>Title Number</b>	322984
<b>Site Location</b>	Land south of 60 Bassett Street, NW5 4PH
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	526.87
<b>Site Commentary</b>	<p>Site is an area of vacant land adjacent to residential blocks at 32-60 Bassett Street. Land may be used as garden but appears neglected. Access of site to residents is unclear.</p> <p>Constraints include: Location adjacent to plant room for residential blocks with potential for noise impact; location adjacent to Conservation Area; and potential overlooking from habitable rooms in the surrounding properties on Bassett Street, Coity Road and Allcroft Road.</p>

## Site 1453 - Athlone Street garages, NW5 3EN



<b>Unique AECOM ID</b>	1453
<b>Title Number</b>	NGL83876
<b>Site Location</b>	Athlone Street garages, NW5 3EN
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	736.54
<b>Site Commentary</b>	<p>Current use of site comprises garages between residential blocks and North London Railway (Overground). If allocated, alternative arrangements for current use would need to be considered. Site is located off Athlone Street and Grafton Road. Warden Road junction lies to the north.</p> <p>Constraints include: Potential noise impact from railway; potential requirement to inform Network Rail as a statutory consultee (as within 10 metres of the railway line); potential for overlooking from residential block on south side of Athlone Street; and location within draft Local Plan site allocation (Policy C13: West Kentish Town Estate).</p>

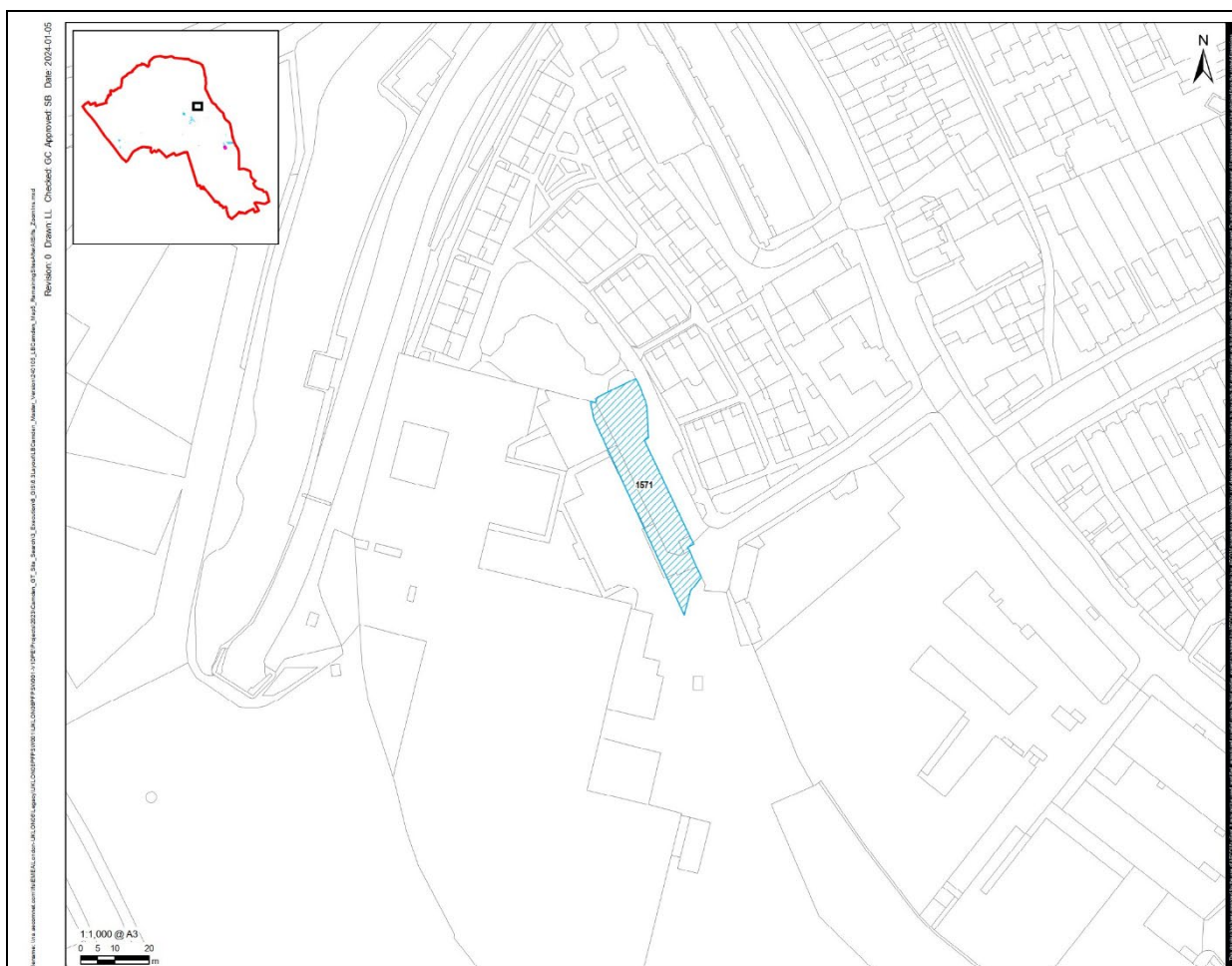
## Site 1535 - Garages at Spencer Rise, NW5 1AP



<b>Unique AECOM ID</b>	1535
<b>Title Number</b>	NGL18123
<b>Site Location</b>	Garages at Spencer Rise, NW5 1AP
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	180.86
<b>Site Commentary</b>	<p>Current use of site comprises garages and car parking to north-west of residential blocks on Spencer Rise. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include some potential for overlooking from residential blocks and terraced properties located opposite, and location within a Conservation Area.</p> <p>This land has also been identified by the Camden Community Investment Programme (CIP) Small Sites initiative and appears to be progressing towards more detailed consideration.</p>



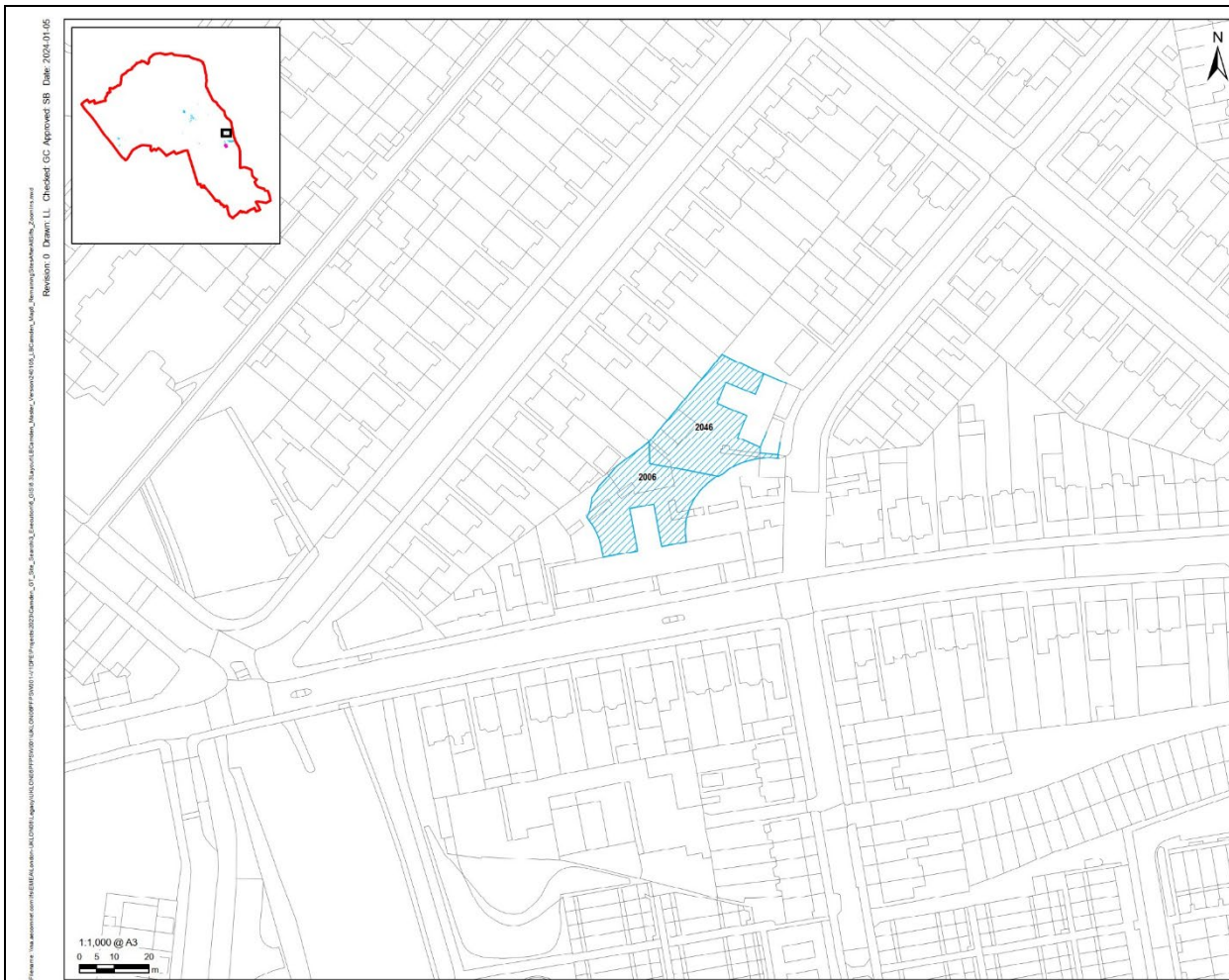
## Site 1571 - Sanderson Close parking, NW5 1TS



<b>Unique AECOM ID</b>	1571
<b>Title Number</b>	NGL190351
<b>Site Location</b>	Sanderson Close parking, NW5 1TS
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	740.91
<b>Site Commentary</b>	<p>Current use of site is parking area between residential properties and builder's yard north of Sanderson Close. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include: Partial location within draft Local Plan site allocation (Policy C3: Murphy Site); partial location (35%) within LSIS (but site does not appear to be in employment use); and part of site (20%) at risk of surface water flooding. This site was included within a consultation on the Camden Community Investment Programme (CIP) Small Sites initiative but appears not to be progressing towards further consideration.</p>

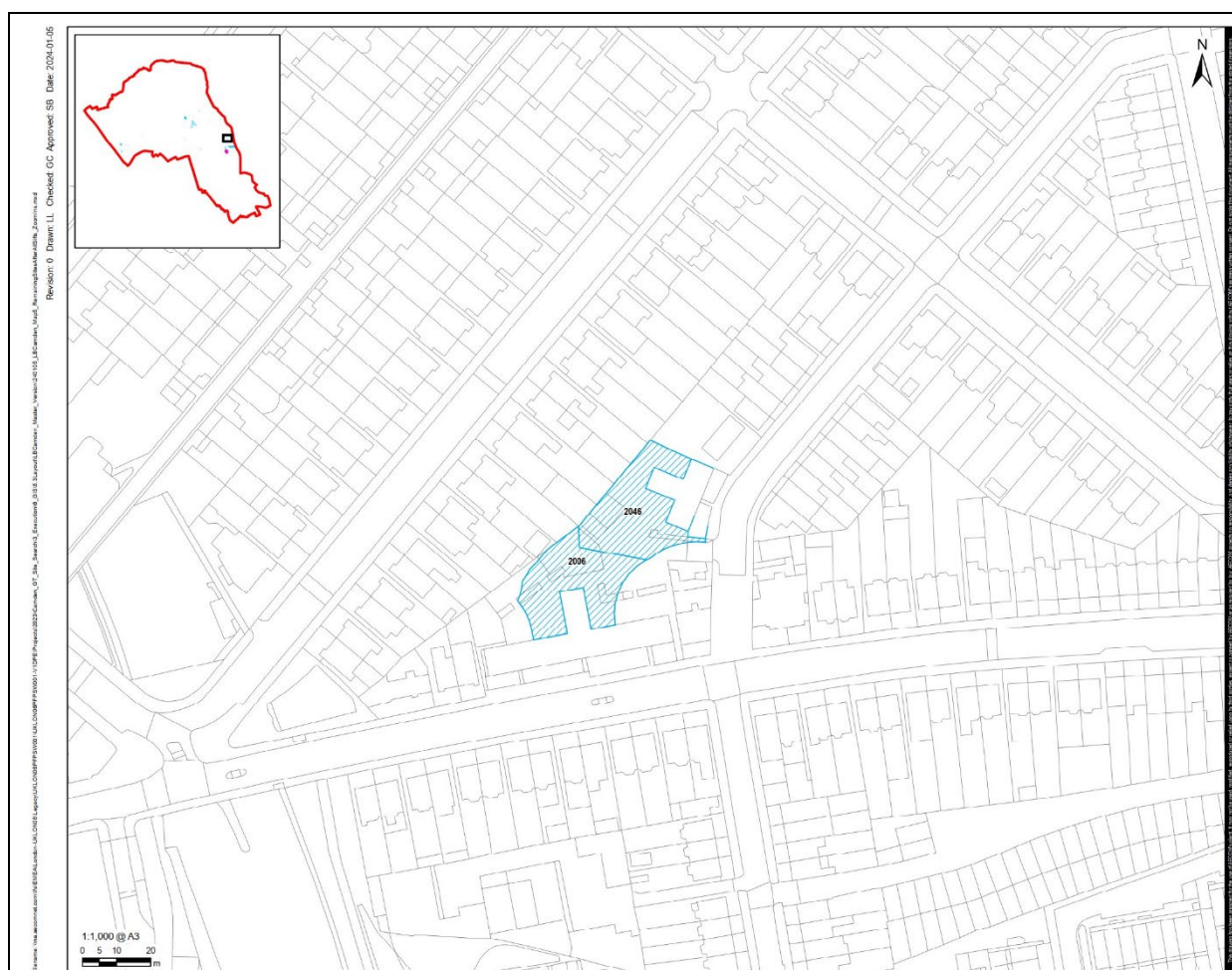


## Site 2006 - Parking rear of Agar Grove parcel 1, NW1 9XL



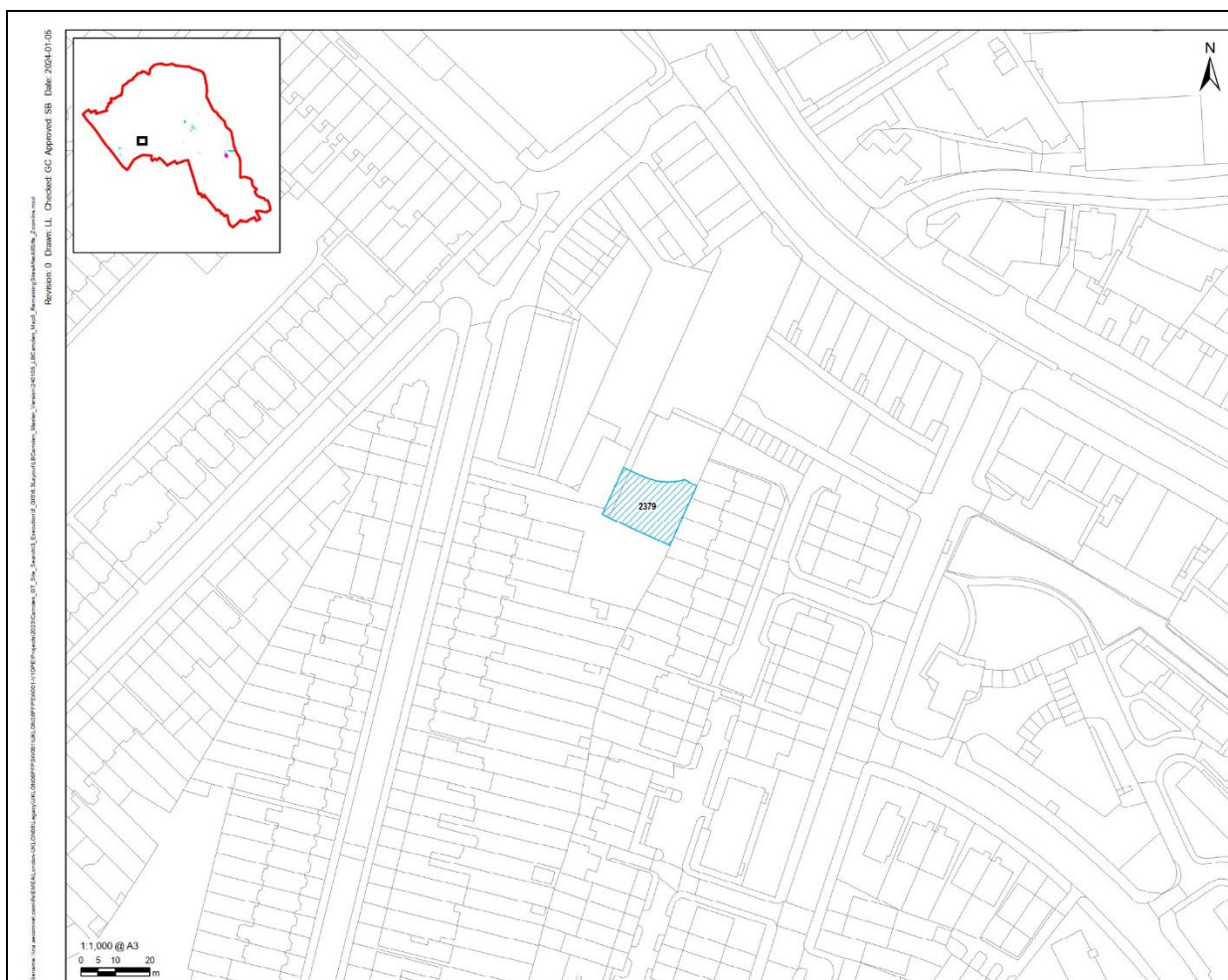
<b>Unique AECOM ID</b>	2006
<b>Title Number</b>	NGL723724
<b>Site Location</b>	Parking rear of Agar Grove parcel 1, NW1 9XL
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	606.16
<b>Site Commentary</b>	<p>Current use of site is parking and circulation space adjacent to another study site (Parking rear of Agar Grove parcel 2 - AECOM ID 2046). Sites could potentially be brought forward together. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include presence of protected trees and location within a Conservation Area.</p>

## Site 2046 - Parking rear of Agar Grove parcel 2, NW1 9XL



<b>Unique AECOM ID</b>	2046
<b>Title Number</b>	NGL723718
<b>Site Location</b>	Parking rear of Agar Grove parcel 2, NW1 9XL
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	638.84
<b>Site Commentary</b>	<p>Current use of site is parking and circulation space adjacent to another study site (parking rear of Agar Grove parcel 1 - AECOM ID 2006). Sites could potentially be brought forward together. If allocated, alternative arrangements for current use would need to be considered.</p> <p>Constraints include presence of protected trees and location within a Conservation Area.</p>

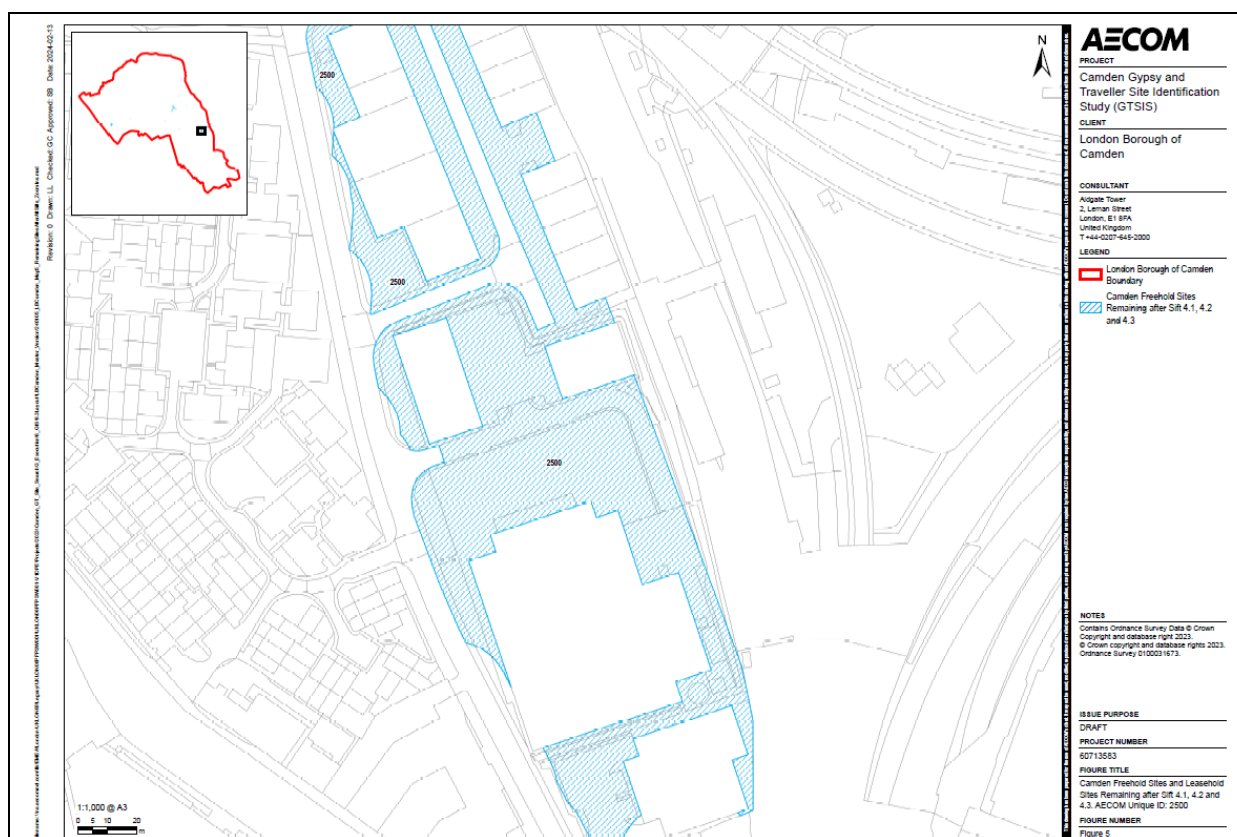
## Site 2379 – Land at 177 Finchley Road, NW3 6LB



<b>Unique AECOM ID</b>	2379
<b>Title Number</b>	
<b>Site Location</b>	Land at 177 Finchley Road, NW3 6LB
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	354.70
<b>Site Commentary</b>	<p>Current use of site is parking area between Goldhurst Terrace and Naseby Close.</p> <p>Constraints include narrow access from Goldhurst Terrace and location adjacent to a Conservation Area. If allocated, alternative arrangements for current use would need to be considered (unclear whether parking is required by shops / businesses on Finchley Road to support employment uses).</p>

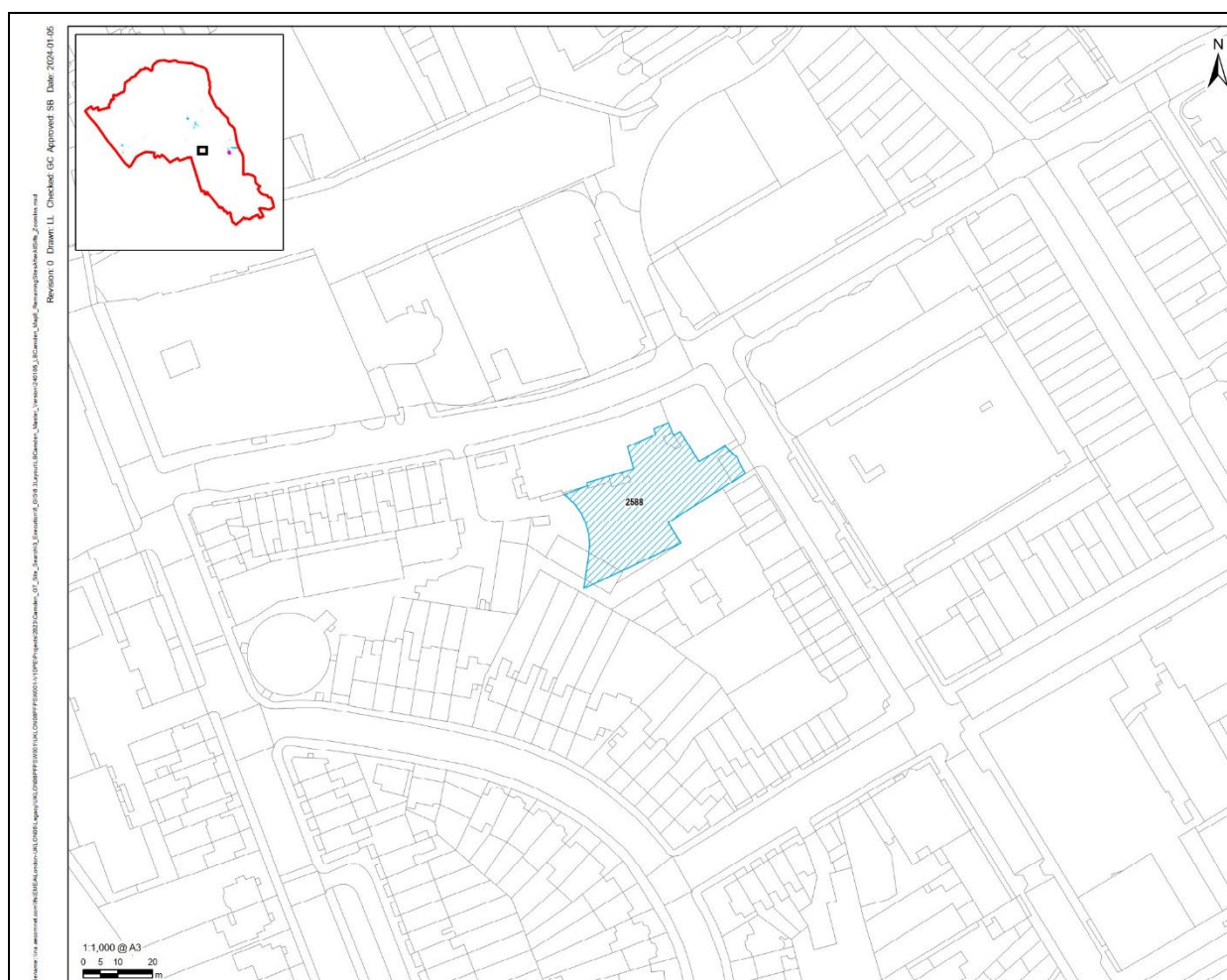


## Site 2500 - Camley Street Industrial Estate, N1C 4PF



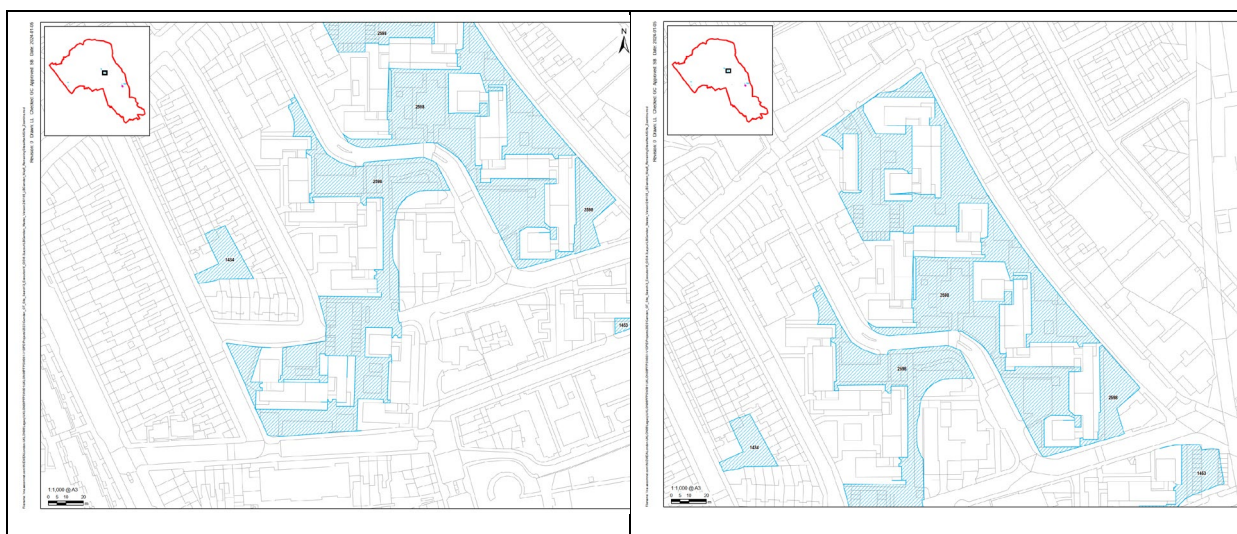
<b>Unique AECOM ID</b>	2500
<b>Title Number</b>	NGL747861
<b>Site Location</b>	Camley Street Industrial Estate, N1C 4PF
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	10,927.35
<b>Site Commentary</b>	<p>This site contains two short-listed land parcels.</p> <p>Current use of site is industrial (Camley Street Industrial estate), including areas of car parking and open land with potential for reallocation. If allocated, alternative arrangements for current uses would need to be considered.</p> <p>Constraints include: Potential for noise impact due to surrounding industrial uses; risk of surface water flooding on part of site (25%); location within draft Local Plan site allocation (Policy S5: 104-114 Camley Street and Cedar Way Industrial Site); location covered by Camley Street SPD; and potential for loss of B2 and B8 class uses on parts of the site.</p>

## Site 2588 - Former depot off Arlington Road, NW1 7DB



<b>Unique AECOM ID</b>	2588
<b>Title Number</b>	NGL20610
<b>Site Location</b>	Former depot off Arlington Road, NW1 7DB
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	1,106.20
<b>Site Commentary</b>	<p>Current use of site is parking area with accompanying garages to the rear of commercial buildings (depot) and Camden Council offices, in active use for delivery and service vehicles. Possible use of part of site as B8 storage (unclear). If allocated, alternative arrangements for current uses would need to be considered. It is considered unlikely that this site is available for development while adjacent depot is operational.</p> <p>Constraints include potential for overlooking from a residential block to the south of the site; location within draft Local Plan site allocation (Policy C18: Arlington Road former depot site); and potential for loss of employment land (unclear whether part of site use is B8).</p>

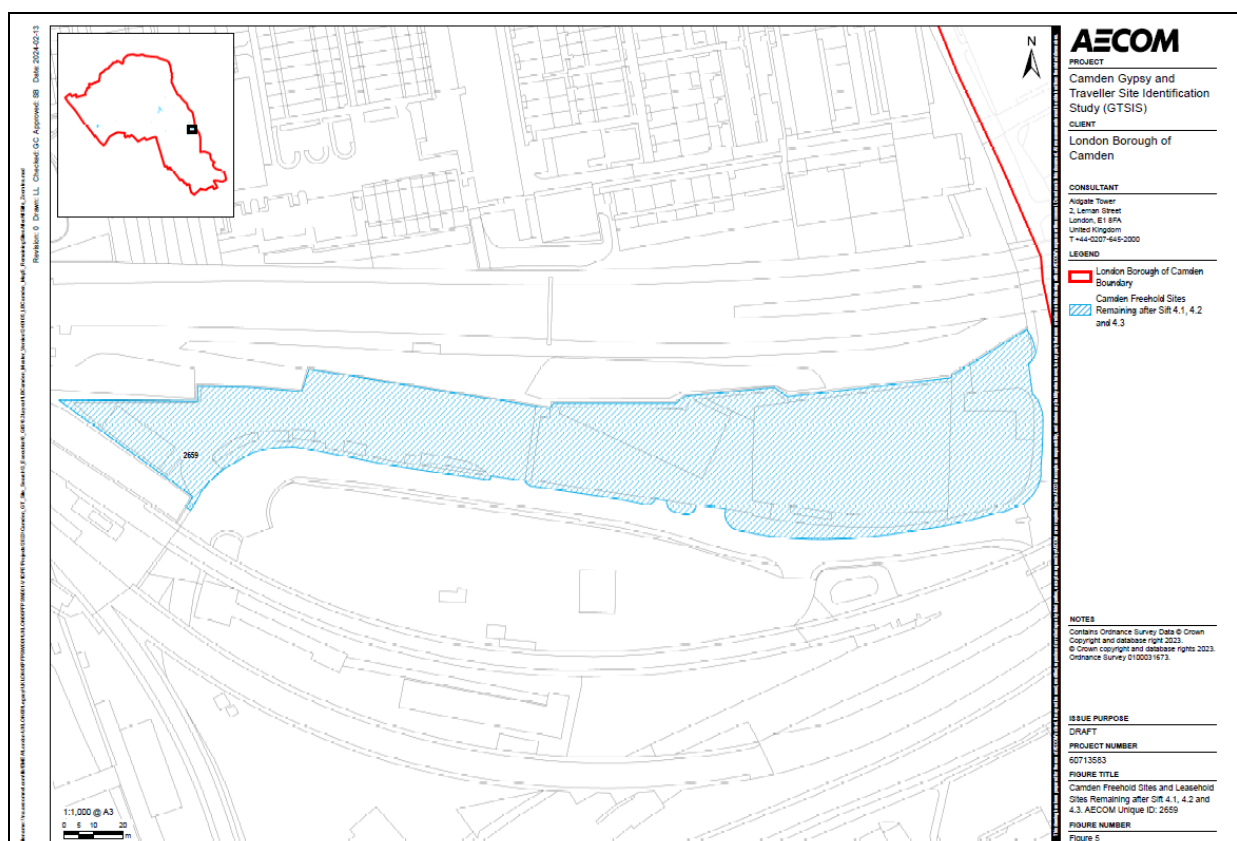
## Site 2598 - West Kentish Town Estate, NW5 4RG



<b>Unique AECOM ID</b>	2598
<b>Title Number</b>	NGL83875
<b>Site Location</b>	West Kentish Town Estate, NW5 4RG
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	14,403.66
<b>Site Commentary</b>	<p>This site contains three short-listed land parcels.</p> <p>Current use of site is green space and parking area located to the north and south of Weedington Road. The land parcel to the south is currently used as a basketball court. If allocated, alternative arrangements for current uses would need to be considered.</p> <p>Constraints include: Location within draft Local Plan site allocation (Policy C13: West Kentish Town Estate); potential for overlooking from residential block to the south, for the parcel to the south of Weedington Road; and potential for overlooking from residential blocks to the north, east, and west of the site for the parcel to the north.</p>

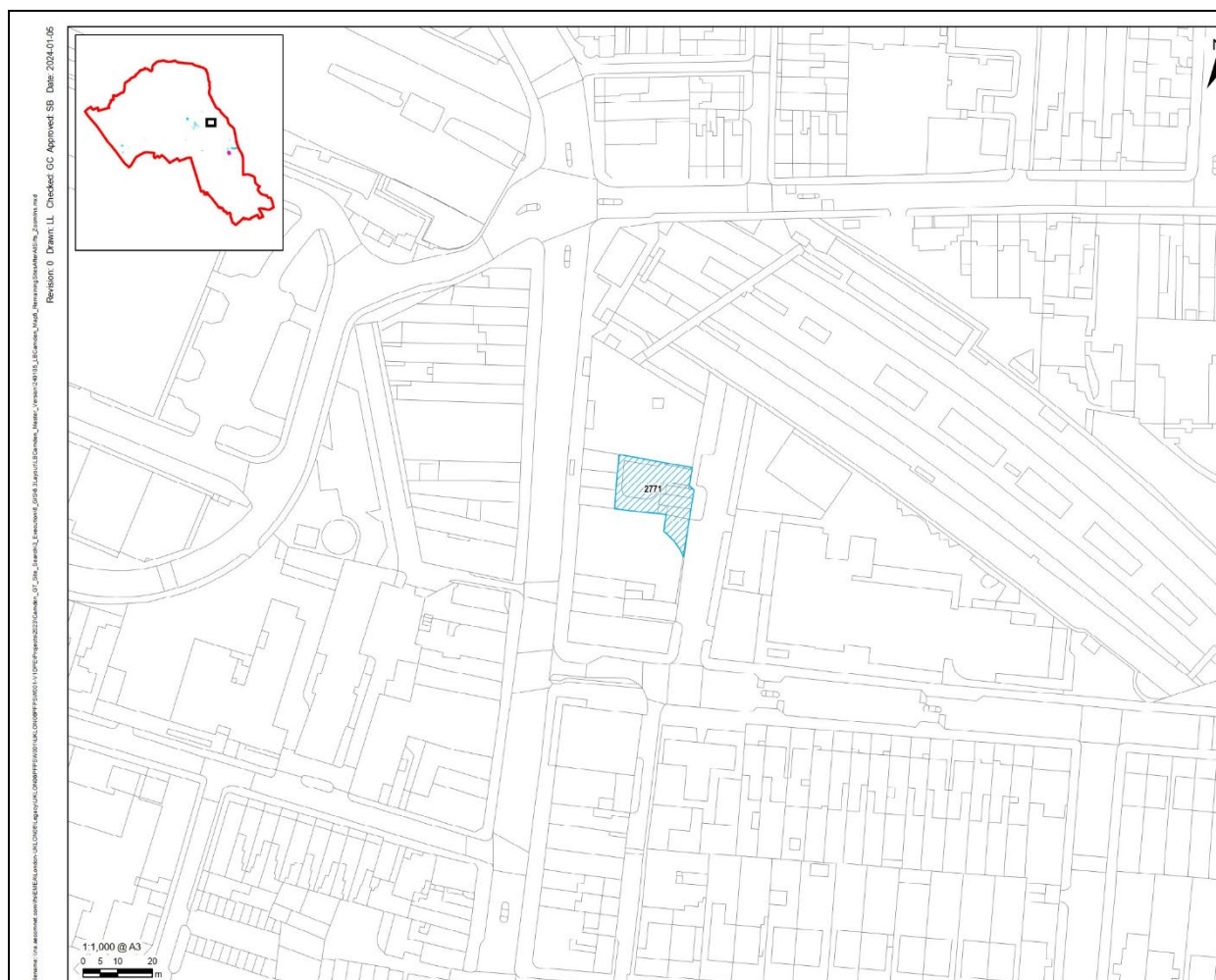


## Site 2659 - Land off Freight Lane, N1C 4BE



<b>Unique AECOM ID</b>	2659
<b>Title Number</b>	
<b>Site Location</b>	Land off Freight Lane, N1C 4BE
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	11,356.37
<b>Site Commentary</b>	<p>Current use of site is Metroliner bus washing facility, Camden Council MOT testing centre located to the north of Freight Lane, and a depot for Camden Accessible Travel Solutions comprising a site office and parking spaces. Site includes car parking, which may have potential for reallocation. If allocated, alternative arrangements for current uses would need to be considered.</p> <p>Constraints include: Potential for noise impacts due to the surrounding heavy industrial uses and multiple railways surrounding the site (including the North London Line, HS1, Midland line out of St Pancras, London and North Eastern Railway out of King's Cross, and connecting freight lines); impact from 'bad neighbour' uses (aggregates plant and concrete batching plant to the south of the site); potential for ground contamination due to present and historic industrial use including evidence of hazardous chemical storage signs; potential for loss of employment; potential conflict with current industrial uses including movement of HGVs; issues with pedestrian safety associated with the industrial nature of the area; and potential need to consult Network Rail (within 10 metres of railway).</p>

## Site 2771 - Frideswide Place, NW5 2AA



<b>Unique AECOM ID</b>	2771
<b>Title Number</b>	NGL715747
<b>Site Location</b>	Frideswide Place, NW5 2AA
<b>Area of Shortlisted Land Parcel(s) (sqm)</b>	380.05
<b>Site Commentary</b>	<p>Current use of site comprises car parking area to the rear of commercial and residential mixed use buildings on Kentish Town Road, off Frideswide Place. If allocated, alternative arrangements for current uses would need to be considered. Loss of parking may impact on operation of employment and retail uses on Kentish Town Road.</p> <p>Constraints include: Potential for overlooking from residential flats to the west of the site; location within an archaeological priority area; and location close to a railway with potential noise impact.</p>

