

**MATTER 3 – MEETING
CAMDEN’S HOUSING
NEEDS**

**CAMDEN COUNCIL
LOCAL PLAN
EXAMINATION**

Bangor Wharf, Georgiana Road

Hearing Statement by Carter Jonas

On behalf of Camprop

March 2026

Carter Jonas

Date: March 2026

Client: Camprop

Client or Job Number: J0098185

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CONTENTS

1.0 INTRODUCTION	5
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2.0 MATTER 3 – MEETING CAMDEN’S HOUSING NEEDS	5
General questions	6
Policy H1	7
Policy H2	7
Policy H4	7
Policy H9	7
Modifications	8

1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Camprop in relation to Bangor Wharf, Georgiana Street, London, NW1 0QS (the Site). Camprop has engaged in the Local Plan process to date and has sought to identify its concerns with the site allocation proposed for Bangor Wharf within the draft Local Plan, from the outset.
- 1.2 In principle, Camprop supports the Plan-led system. For a Plan-led system to function it requires Local Plans to be not only legally compliant and sound, but for them also to be deliverable, proportionate and based on clear evidence.
- 1.3 Camprop is of the view that the new Local Plan should be reflective of the Government's housing ambition for 1.5 million homes.
- 1.4 The National Planning Policy Framework (NPPF) confirms that Plans will be sound if they are positively prepared, justified, effective and consistent with national policy. For the reasons identified in the representations, which we will expand on, the Plan only accords with some of these requirements.
- 1.5 The Site is a corner site fronting Georgiana Street and Regents Canal and is located centrally within the London Borough of Camden. It has a PTAL of 6a. The Site has a commercial use but has been vacant for more than 10 years. It is a highly sustainable brownfield site, clearly in need of redevelopment, but there are significant heritage and planning constraints that pose challenges to new development coming forward on the Site.
- 1.6 The Site benefits from an existing site allocation (ref: site 35) in Camden's Local Plan (2017) for redevelopment to provide a mixed-use scheme including residential and replacement employment space. The draft Local Plan seeks to retain the allocation (ref: S10), albeit with some important and fundamental differences. The most fundamental is the expansion of the site allocation to include the adjacent site, Eagle Wharf.
- 1.7 The Site has a complex and protracted planning history with various site owners trying unsuccessfully to achieve planning permission for residential development on the Site since 2015. The most relevant application was in 2016 for 46 homes (ref: 2016/1117/P) which was refused by Camden Council with 18 reasons for refusal and dismissed by a Planning Inspector at appeal in January 2018.
- 1.8 Camprop is presently seeking pre-application advice from Camden Council on the redevelopment of the Site for Purpose Built Student Accommodation (PBSA). PBSA is a viable use that successfully addresses the previous reasons for refusal on the Site.
- 1.9 Camprop has made representations to the Regulation 19 stage of the Local Plan in June 2025.
- 1.10 This Hearing Statement expands on the issues identified within the previous representations regarding the Councils' failure to consider evidence about the proposed land uses allocated within Site Allocation S10. The land uses currently proposed in the allocation are not considered viable and therefore the site allocation as drafted, is not currently deliverable.
- 1.11 If it is not possible for this fundamental matter to be resolved, then Camprop consider the Plan is incapable of being taken forward to adoption. Whilst it would effectively result in a short-term Plan vacuum this can be remedied in the medium-term through the production of a deliverable Plan that proposes site allocations that are sound and deliverable.

2.0 MATTER 3 – MEETING CAMDEN’S HOUSING NEEDS

Issue 1 – Whether the Plan has been positively prepared and is underpinned by up-to-date and robust evidence, and whether it is justified, effective, consistent with national policy and is in general conformity with the London Plan in relation to meeting

General questions

Q4. Amongst other things, Policy H2 of the London Plan 2021 requires boroughs to identify and allocate suitable small sites (under 0.25 hectares) for housing. How does the expected proportion of homes to come forward on small sites in the Borough reflect a genuinely plan-led approach to meeting this requirement?

- 2.1 Camprop supports London Plan Policy H2 and the requirement for boroughs to allocate small suitable sites for housing. Site allocation reference S10 (Bangor Wharf & Eagle Wharf) meets this criteria. However, it must be acknowledged that financial viability is far more tenuous on smaller sized sites with costs comprising a greater proportion of development sales receipts and therefore Camprop requests greater flexibility within the allocation wording of S10. The housing delivery types within S10 should be amended to ensure some form of housing comes forward, be that self-contained homes, or non-self contained homes in the form of specialist housing such as Purpose Built Student Accommodation (PBSA), co-living or Built To Rent (BTR). Delivery of these other forms of specialist homes helps to increase the overall quantum of housing delivery to provide greater choice and availability to residents (as supported in London Plan policy) which will subsequently improve affordability in the borough as a whole.
- 2.2 As currently drafted, site allocation S10 restricts development coming forward as the proposed allocated use is overly restrictive and is not flexible enough within challenging market times. At present, the plan-led approach to housing delivery is not working for Bangor Wharf due to the restriction within the proposed land use within site allocation S10.

Q5. How clearly does the Plan explain the amount of housing expected to come forward on small and medium sized sites (up to one hectare) in line with the NPPF?

- 2.3 Paragraph 73 (a) of the NPPF requires local authorities to allocate 10% of their housing requirement on sites no larger than one hectare. It is not clear from the Submission Local Plan or the Housing Trajectory and Five Year Supply, what percentage of the housing requirement is formed of small and medium sized sites. The Council’s compliance with the 10% requirement should be explained.

Q6. Are any modifications required for soundness?

- 2.4 Yes. NPPF paragraph 16 outlines that Local Plans should be prepared positively at Regulation 19 stage. Camprop outlined that Bangor Wharf and Eagle Wharf are in separate ownerships and are very unlikely to be delivered together. Yet the site allocation (ref: S10) that encompasses both sites continues. The allocation should be split into two - with self-contained homes allocated to Eagle Wharf and alternative specialist housing allocated to Bangor Wharf. The NPPF requires housing sites to be deliverable and as currently drafted, site allocation reference S10 is not deliverable.

Issue 2 – Whether the Plan will be effective in delivering affordable housing to meet the Borough’s needs and in providing an appropriate mix and standard of homes for different groups in the community during the Plan period?

Policy H1

Q14. Is support for purpose built student accommodation in Policy H1 justified?

- 2.5 Yes, support for PBSA within Policy H1 Part B (2) is justified. The delivery of PBSA helps to free up general needs housing and HMO’s for families and private renters. PBSA is recognised within London Plan Policy H15 as a specialist housing use that reduces pressure on the private rented sector and it can contribute to mixed, inclusive and high-quality neighbourhoods, in line with the aims and ambitions of the NPPF.

Policy H2

Q17. Is the policy requirement to provide a mix of uses on all qualifying sites justified and effective?

- 2.6 No. Part D requires an early or late stage review if the amount of affordable housing falls below 50% due to viability. This onerous requirement has the potential to cause issues with funding and investment due to the uncertainty it creates at the later stages of development. A core principle of the NPPF is that viability should be addressed at the plan-making stage, not through later review mechanisms.

Q19. Is the threshold of 200sqm or more justified and effective?

- 2.7 Camprop query whether Policy H2 has been viability tested to ensure that proposals that only just breach a threshold of 200sqm can viably afford to provide permanent self-contained housing.

Policy H4

Q29. Is the policy consistent with national policy and in general conformity with the London Plan?

- 2.8 No. Policy H4 does not conform with London Plan Policy H15 (PBSA). Policy H4 Part C gives the impression of being in conformity with London Plan H15 by stating it will apply the London Plan provisions but then it swiftly moves on to state that as an alternative it will “*strongly encourage contributions of self-contained housing on these development sites... where feasible*”. Camprop contends that this wording is not in conformity with the requirements of London Plan Policy H15 and affordable provision on PBSA should be restricted to Affordable Student Accommodation only. Amendments are respectfully requested to ensure conformity with the London Plan.

Policy H9

Q47. Is the requirement in B.3 of the Policy to comply with relevant standards for houses in multiple occupation justified?

- 2.9 No. The requirement for PBSA to comply with HMO standards and relevant residential design standards conflicts with the design requirements within London Plan Policy H15 and the PBSA London Plan

Guidance prepared by the Mayor. London Plan Policy H15 Part 4 (c) requires PBSA to provide functional and living space and layout and therefore it is not justified or sound to go significantly beyond this requirement and standards within the PBSA LPG.

Modifications

Q52. Are any modifications required for soundness?

2.10 Camprop recommend the following modifications for soundness:

- Policy H2 – reference to an early or late stage review for schemes that cannot deliver up to the 50% affordable requirement should be removed, unless it can be specifically demonstrated that it will not impact future housing delivery.
- Policy H4 – Part C should not encourage on-site provision of self-contained homes as an alternative strategy to Affordable Student Accommodation, as this is not in conformity with London Plan Policy H15.
- Policy H9 – the requirement for PBSA to comply with HMO and relevant residential design standards goes far beyond the requirements of London Plan Policy H15 and therefore the policy as drafted is not in conformity with the London Plan. The wording in the policy should be amended to remove the reference to HMO and relevant residential design standards to ensure soundness.

