

EXAMINATION OF THE LONDON BOROUGH OF CAMDEN LOCAL PLAN

HEARING STATEMENT FOR FRASERVIEW INVESTMENT (CAMLEY STREET) LIMITED

MATTER 3 – MEETING CAMDEN'S HOUSING NEEDS

MARCH 2026

Prepared By



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1.0 Introduction

- 1.1 This Hearing Statement is submitted on behalf of Frasersview Investment (Camley Street) Limited [the **Landowner**], who holds a long leasehold interest in 106 Camley Street which forms a significant portion of Site Allocation S6 (104–114 Camley Street and Cedar Way Industrial Estate). The Landowner's Regulation 19 representations were submitted by NTA Planning in June 2025 [representor reference No: 585].
- 1.2 Since those representations were submitted, the Landowner has agreed heads of terms with a specialist developer to bring forward a comprehensive mixed-use scheme at 104–106 Camley Street. This Hearing Statement is submitted by the Landowner and reflects the emerging scheme being progressed by the selected developer.
- 1.3 This statement is submitted in relation to Matter 3, Issue 2, Q15 (Policy H1) and Q20 and Q21 (Policy H2). These questions are directly relevant to the Landowner's representations on Site Allocation S6 and to the emerging proposals for 104–106 Camley Street, which include a substantial component of Purpose-Built Shared Living ("PBSL") as the mechanism for delivering viable and meaningful housing (including affordable housing) on the site.

2.0 Matter 3: Meeting Camden's Housing Needs

Q15 – Is the definition of "permanent self-contained housing" justified and effective?

- 2.1 The Local Plan recognises Purpose-Built Shared Living ("PBSL") as a housing typology through Policy H10 (Housing with Shared Facilities) and Policy H4(D), which applies the London Plan's distinctive affordable housing provisions to PBSL schemes. However, Policy H1 identifies permanent self-contained housing as the priority land use of the Plan, and Policy H2 which relates to mixed-use development in high-accessibility areas is explicitly limited to the provision of Use Class C3 self-contained housing. Paragraph 7.38 of the Local Plan confirms that Policy H2 "specifically seeks provision of permanent self-contained housing (Use Class C3) in line with the priority land-use of the Plan as set out in Policy H1." As a consequence, PBSL cannot satisfy the H2 requirement.
- 2.2 This creates an inappropriate policy conflict for sites where PBSL is the deliverable mechanism for achieving meaningful affordable housing. PBSL provides private en-suite rooms with shared communal facilities. It is a sui generis use and is not self-contained housing. It meets genuine housing need for single-person households and others who are unable to access conventional self-contained market or affordable housing. Yet because it cannot satisfy the H2 requirement, a scheme that delivers superior affordable housing outcomes through a PBSL model is in direct technical conflict with H2 in a way that a conventional C3 scheme delivering less affordable housing is not.
- 2.3 This conflict is not resolved anywhere in the Plan. Policy H10 governs the design and management of PBSL but does not address its relationship with Policy H2. Policy H4(D) applies London Plan affordable housing provisions to PBSL but does not resolve the relationship with Policy H2. The result is that the Plan as currently drafted fails to provide an effective policy framework for PBSL on allocated sites in high-accessibility areas, including Site Allocation S6 which is a matter of soundness, is inconsistent with the London Plan's recognition of PBSL and is not justified by the evidence base.

Modification required:

- 2.4 Policy H1 should be modified to acknowledge PBSL as a recognised residential typology that can contribute to meeting housing needs, including affordable housing needs, alongside self-contained homes. The supporting text should clarify how PBSL will be assessed in the context of the priority given to self-contained housing, including by reference to the GLA's equivalence methodology.

Q20 – How will a 50% self-contained housing requirement be deliverable across all defined high accessibility areas?

- 2.5 The Landowner's site at no.106 Camley Street falls within a high-accessibility area for the purposes of Policy H2. The policy requires that at least 50% of additional floorspace in qualifying non-residential schemes be provided as self-contained housing. Applied to a scheme that includes PBSL, this creates an unworkable position: PBSL is a sui generis use and does not directly satisfy the self-contained housing requirement, even where it delivers greater housing and affordable housing benefits than a conventional self-contained scheme could achieve on the same site.
- 2.6 The Council's own Viability Study acknowledges that scheme viability varies significantly by location. Financial viability analysis for the emerging Camley Street South site demonstrates that a conventional self-contained C3-only scheme would support a significantly lower level of affordable housing than the hybrid PBSL model. A rigid interpretation of Policy H2 would therefore result in less affordable housing delivered contrary to the Plan's objectives.
- 2.7 The Inspector's question itself suggests that the blanket 50% self-contained housing requirement may not be uniformly deliverable. The Landowner agrees. For the Camley Street site, and for comparable high-accessibility brownfield locations in Camden where conventional C3 viability is constrained, the requirement as currently drafted risks being neither sound nor effective.

Modification required:

- 2.8 Policy H2 should be modified to provide that, in high-accessibility areas, PBSL may contribute to the housing floorspace requirement using an agreed equivalence methodology such as the GLA's co-living to C3 ratio of 1.8:1, where it can be demonstrated that PBSL delivers equivalent or greater affordable housing outcomes than a conventional self-contained scheme. The supporting text should confirm the methodology for calculating PBSL contributions toward the 50% housing floorspace requirement.

Q21 – Does the policy provide sufficient flexibility in the type of housing provided?

- 2.9 No. Policy H2 as drafted does not provide sufficient flexibility in the type of housing that can satisfy the housing floorspace requirement. The question is directly relevant to the emerging proposals for Site Allocation S6, where PBSL is the mechanism that makes the scheme viable and enables a meaningful affordable housing contribution to be delivered.
- 2.10 The emerging scheme at Camley Street South proposes affordable PBSL units secured at Camden Living Rent and GLA intermediate rent levels. However, this offer is only achievable and replicable across the allocation if Policy H2 recognises PBSL as a qualifying housing contribution. Without that recognition, applicants on sites with comparable viability characteristics to Camley Street South face a binary choice between a conventional C3 scheme

with minimal affordable housing, or a PBSL scheme that is in technical conflict with H2. Neither outcome advances the Plan's housing delivery objectives.

Modification required:

- 2.11 Policy H2 should be amended to explicitly recognise PBSL as a housing typology that may contribute to the self-contained housing floorspace requirement in appropriate locations, subject to affordable PBSL being provided on equivalent terms to conventional intermediate housing.

3.0 Summary of Modifications Sought

3.1 The following modifications to Policies H1 and H2 are sought for reasons of soundness:

- (i) Amend Policy H1 to acknowledge Purpose-Built Shared Living as a recognised residential typology capable of contributing to the Plan's housing objectives alongside self-contained homes.
- (ii) Amend Policy H2 to provide that PBSL may contribute to the self-contained housing floorspace requirement in high-accessibility areas, applying the GLA's co-living to C3 equivalence methodology (currently 1.8:1), where PBSL delivers equivalent or greater affordable housing outcomes than a conventional self-contained scheme.
- (iii) Amend the supporting text to Policy H2 to confirm the methodology for calculating PBSL contributions toward the 50% housing floorspace requirement and the affordable housing terms required of PBSL schemes

4.0 Conclusion

- 4.1 The definitions and requirements of Policies H1 and H2 as currently drafted do not adequately accommodate Purpose-Built Shared Living. This creates a policy gap that will directly constrain the deliverability of sites, including Site Allocation S6 where PBSL is the mechanism that makes viable affordable housing provision possible.
- 4.2 Given current housing delivery in Camden and London as a whole, the Plan cannot afford policies that inadvertently exclude deliverable and affordable housing generating typologies. The modifications sought are consistent with the London Plan and the Council's own housing delivery objectives. They are necessary for soundness.