

EXAMINATION IN PUBLIC OF CAMDEN'S LOCAL PLAN

HEARING STATEMENT PREPARED BY DP9 LTD ON BEHALF OF KILBURN AND DISTRICT PROPERTIES LIMITED

13/03/2025

Matter 3: Policy H4 and H9, Matter 7: Policy D2, and Matter 10: Site Allocation C16

Introduction

1. This Hearing Statement has been prepared by DP9 Ltd on behalf of Kilburn and District Properties Limited specifically in response to Questions raised to both Matters 3, 7 and 10, issued by the Inspector.
2. Kilburn and District Properties Limited are the owners of Camden Point (also known as Shirley House) in LBC, referred to in the emerging Local Plan documentation as Site Allocation C16. The Site was previously occupied by the British Transport Police until December 2024 when they vacated the Site. It is situated within the Regent's Canal Conservation Area and located outside of Camden Town's Centre and the Central Activities Zone ('CAZ').
3. This Hearing Statement is submitted following Kilburn and District Properties Limited's earlier representations to the Regulation 19 stage of the draft Local Plan. This Hearing Statement seeks to reinforce the points made in the previously submitted representations and requests modifications to ensure the policies are justified, effective and consistent with national and regional policy.

Matter 3, Policy H4 (Affordable Housing):

Q29-31

4. Policy H4 is a principal mechanism for delivering affordable housing in Camden. However, the policy does not yet provide a sufficiently clear or consistent framework for how Purpose-Built Student Accommodation (PBSA) is expected to contribute to affordable housing delivery. Without clarity on contribution mechanisms, thresholds, or calculation methodologies, the policy risks being ineffective in practice and may restrict the delivery of PBSA schemes.

Q32-36

5. The Submission Draft Local Plan recognises that indicative capacities are not fixed and may be exceeded where justified through high-quality design and heritage assessment. This reinforces the importance of ensuring that the supporting policies, including H4, enable, rather than inhibit, optimal delivery on appropriate sites. The absence of defined PBSA contribution pathways creates uncertainty and may inadvertently limit the delivery of student beds that the Plan otherwise supports.



Q37-41

6. In order to ensure that the Plan is positively prepared, justified, and effective, Policy H4 should articulate explicitly how PBSA can satisfy affordable housing requirements. This should include (a) affordable student accommodation calculated using defined parameters, or (b) a payment in lieu derived from a transparent and proportionate formula.
7. Policy H4 should also specify the conditions under which PBSA may utilise the fast-track route, aligning with the London Plan and providing certainty for developers and decision-makers. This will improve the consistency and effectiveness of the policy framework.
8. Establishing a clear hierarchy of obligations would further support sound decision-making and ensure that PBSA contributes meaningfully to Camden's affordable housing objectives while offering developers the predictability required for delivery.

Matter 3, Policy H9 (Purpose-Built Student Accommodation):

Q43-45

9. Policy H9 provides the policy framework for enabling the delivery of PBSA across Camden. Given Camden's significant and ongoing student accommodation need, this policy plays a critical role in ensuring that the Plan contributes to meeting the overall housing requirement in a balanced and sustainable manner.
10. The reference in Policy H9 to an 'appropriate contribution' under Part B.12 lacks sufficient precision. Without defined parameters or calculation methodologies, developers cannot reliably determine how their proposals will be assessed, which may deter the delivery of PBSA.

Q46-47

11. To ensure predictable application, the Plan must clarify key terms such as 'disproportionate loss'. Without such definition, decision-making may be subjective and uneven across development proposals.

Q48-50

12. For effectiveness and soundness, Policy H9 should set out contribution mechanisms for PBSA, explain the relationship with Policy H4(d), and embed monitoring arrangements to support robust assessment of policy performance over time.

Matter 7, Policy D2 (Tall Buildings):

Q4-6

13. Policy D2 provides the framework for identifying appropriate locations for tall buildings. While the evidence appears broadly robust, inconsistencies arise where site allocations, such as C16, anticipate upward extension but Policy D2 maps do not reflect this potential.

Q7-8



14. The Submission Draft Local Plan emphasises optimisation of land and efficient use of brownfield sites (Policy DS1). These principles support recognising sites such as C16 as capable of accommodating potential for upward extension, where justified by high-quality design and heritage assessment. Enhanced public realm, activation at ground level, and improvements to the canal environment, measures that the emerging scheme is expected to deliver, further reinforce the site's suitability for sensitively managed additional height.

Q9-10

15. To improve the internal consistency of the Plan, Policy D2 should identify C16 as a location suitable for additional height, subject to detailed assessment. This refinement would not predetermine planning outcomes but would instead signal a coherent and enabling policy framework.

Matter 10, Site Allocation C16:

Q50

16. The indicative capacity of 197 PBSA units is not supported by proportionate evidence. The Plan confirms indicative capacities may be exceeded, allowing higher numbers where justified. C16's context and continued pre-application engagement with the Council supports intensified use, and an indicative capacity of circa 350 PBSA rooms would ensure effectiveness and alignment with optimisation principles. The current figure therefore represents a conservative baseline rather than a development ceiling.
17. C16 is a highly accessible urban brownfield site with significant potential for intensification. It is located outside the CAZ, within an area that the Plan identifies as suitable for optimisation, with a building form and context that can support increased density. The potential for upward extension is consistent with both the allocation text and the design principles underpinning Policy DS1. In addition, the scheme will deliver enhanced public realm, active frontages, and improvements to the canal edge, interventions that positively support increased capacity and help integrate the development into the surrounding townscape.
18. The optimisation principles in Policy DS1 align directly with London Plan Policy D3 (Optimising Site Capacity), which promotes a design-led approach to maximising development potential on appropriate sites. Policy D3 explicitly recognises that additional height may be suitable where it forms part of a well-considered townscape strategy. The characteristics of C16, including its accessibility, brownfield nature, and ability to deliver wider public realm benefits, place it firmly within the category of sites identified by Policy D3 as capable of accommodating increased height.
19. To ensure the allocation is effective and aligned with the Plan's optimisation principles, the indicative capacity should be revised to: 'circa 350 PBSA rooms (minimum 197), subject to detailed design, heritage and amenity assessment'. This reflects a realistic and deliverable expectation for the site while maintaining flexibility and recognising the potential for optimisation through the ongoing design process.



Conclusion

20. In summary, the modifications sought are necessary to ensure that the emerging Local Plan is positively prepared, justified, effective, and consistent with national and regional policy. For Policies H4 and H9, greater clarity on the mechanisms for PBSA affordable housing contributions is essential to provide certainty for applicants and decision-makers, support viable delivery, and ensure that Camden can meet its identified student accommodation needs. For Policy D2, recognising the potential for additional height at Site Allocation C16 would align the policy framework with the Plan's optimisation principles and the evidence concerning the site's capacity. Finally, revising the indicative capacity for C16 to reflect a more realistic and deliverable level of development, circa 350 PBSA rooms, would ensure the allocation is effective and capable of making a meaningful contribution to Camden's housing and student accommodation objectives. Collectively, these refinements will strengthen the coherence of the Local Plan and support the delivery of sustainable, well-designed development on this important brownfield site.

21. Kilburn and District Properties Limited support the overarching aims and objectives of the Proposed Submission Draft Local Plan and welcome the opportunity to engage with the Inspector and policy team to optimise the current Site Allocation.