

**MATTER 4 – HOUSING
LAND SUPPLY**

**CAMDEN COUNCIL
LOCAL PLAN
EXAMINATION**

Bangor Wharf, Georgiana Road

Hearing Statement by Carter Jonas

On behalf of Camprop

March 2026

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Client: Camprop

Client or Job Number: J0098185

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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 listen to evidence about the proposed land uses allocated within Site Allocation S10. The land uses currently proposed in the allocation are not viable and therefore the site allocation is not deliverable, as currently drafted.
- 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 4 - HOUSING LAND SUPPLY

Issue – Whether the Local Plan is justified, effective and consistent with national policy, and in conformity with the London Plan in relation to demonstrating the housing land supply position throughout the plan period.

Questions

Q2. Does the trajectory identify the components of the housing land supply across the plan period with sufficient clarity? Is it based on up-to-date evidence?

- 2.1 Council document SD14 Housing Trajectory 2026-2040 and Five Year Housing Land Supply 2026-2040 identifies at Figure 1 the proposed delivery of housing across the plan period. It anticipates that site allocation S10 will deliver self-contained homes in 2032/33. Camprop contends that this is not a realistic proposition as the current proposal for Bangor Wharf is PBSA. The Site is highly constrained to provide self-contained homes and feasibility testing has demonstrated it is not a viable use now, or within the plan period.
- 2.2 It is understood that the owner of Eagle Wharf does not intend to redevelop their site in the immediate future, therefore the delivery of self-contained homes on either Bangor Wharf or Eagle Wharf by 2032/33 is uncertain. The trajectory is not based on recent evidence submitted to the Council in Camprop's representations to the Draft Submission Local Plan in June 2025.
- 2.3 Paragraph 5.1 outlines that the Council's assessment of the cumulative 15-year delivery of self-contained housing from smaller developments has been updated following the publication of the Submission Draft Local Plan. Camprop contend that self-contained housing on Bangor Wharf (ref S10) is not presently deliverable and the trajectory should be amended accordingly.

Q3. The Council Housing Trajectory and 5 Year Housing Land Supply Note (SD14) provides 3 different 5 year housing land supply results; 5.2 years, 4.4 years and 2.8 years. Which of the supply results is the Council replying upon for soundness and does this comply with national policy requirements for backlog and a buffer?

- 2.4 Document SD14 confusingly does outline three possible 5 year housing land results. Camprop contend that the 2.8 years calculation is the correct figure as it includes the shortfall/backlog of homes (2,274.8) and applies the 20% buffer, which is necessary due to the poor Housing Delivery Result of 53% over the last three years. The calculation demonstrates that further sites may need to be allocated within the borough to ensure the Council has a deliverable five year supply of housing when the Plan is adopted. This is a key requirement of the NPPF, as stated at paragraph 72(a).
- 2.5 **Q8. Overall, are the assumptions about deliverability realistic and justified?**
- 2.6 No. As outlined at paragraph 2.1 above, the deliverability of self-contained homes on site allocation S10 is unlikely given the past planning history of the site, viability challenges and the unlikely delivery on Eagle Wharf. Based on this evidence for site allocation S10, the plan is not deliverable or realistic.

Q9. Several major sites are at pre-application stage but have nonetheless been included as deliverable (for example, St Pancras Hospital, Royal College Street, Regis Road). What evidence demonstrates deliverability in instances where a site does not have planning permission?

- 2.7 As outlined at paragraph 2.5, the deliverability of self-contained housing on site allocation S10 is questioned. It is unclear where the evidence has come from to demonstrate that self-contained housing is possible on the Site, given its highly constrained nature and the viability challenges.

Q13. Does the evidence demonstrate that the Plan, taken together with completions, commitments and allocations in the existing development plan for the area and windfall allowance will provide a supply of specific, developable or broad locations for growth for years 6-10 and wherever possible years 11-15 of the plan period?

- 2.8 Document SD14 outlines that site allocation S10 will deliver self-contained housing in 2032/33, within the 6-10 year plan period. For the reasons outlined above, Camprop contends this is not a realistic prospect.

Modifications

Q16. Are any modifications required for soundness?

- 2.9 Yes. More sites should be allocated generally to raise the five housing land supply up from 2.8 years.
- 2.10 In respect of site allocation S10, evidence has been submitted by Camprop to demonstrate that self-contained homes cannot be delivered as it is not viable to do so now, or later in the plan period. Instead, the housing trajectory should be updated to reflect the Site being brought forward for specialist housing such as PBSA, co-living or Build to Rent.

