

**MATTER 5 – DELIVERING
AN INCLUSIVE ECONOMY**

**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

Contacts: Katy Davis and Jennifer Turner (Carter Jonas)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CONTENTS

1.0 INTRODUCTION	5
2.0 MATTER 5 – DELIVERING AN INCLUSIVE ECONOMY	5
Policy IE2	6
Modifications	6

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 5 – DELIVERING AN INCLUSIVE ECONOMY

Issue: Whether the Plan has been positively prepared, is justified, effective, consistent with national policy and in general conformity with the London Plan in addressing the economy and employment needs of the Borough.

Policy IE2

Q8. Is the requirement in criterion C to market offices using a variety of agents for at least 12 months justified?

- 2.1 No. Camprop do not consider criterion C to be proportional or justified where a building has been vacant and derelict for more than 10 years. The request to also require marketing by a variety of agents is not proportional and the wording is ambiguous, how many is a variety of agents?

Q9. Is the requirement in criterion C (part 2) of the Policy to consider discounted rents, incentives and flexible leasing arrangements justified?

- 2.2 No. Camprop consider that part 2 of criterion C is not commercially viable for sites to endure.

Q10. Is the requirement in criterion C (part 3) of the Policy to consider reconfiguration of the premises justified?

- 2.3 No. Camprop do not consider that requirements of criterion C (part 3) should apply to buildings that have been vacant and derelict for more than 10 years. Given this length of time, a substantial amount of structural, internal and external work would be required to bring a property up to modern standards in terms of building regulations, fire safety and accessibility compliance.

Q12. Is the preference for housing in circumstances where an office use of a building is no longer feasible in Policy IE2 justified?

- 2.4 Yes. Camprop support the alternative use to housing but request greater flexibility in the policy wording of part D to include acceptable specialist forms of housing, such as PBSA, co-living and build to rent.

Modifications

Q35. Overall, are any modifications required to economic policies in the Plan required for soundness?

- 2.5 Yes. The following amendments should be made to ensure the Plan is deliverable and justified:
- 1) Exempt vacant buildings of more than 10 years from Policy IC2 criterion C (part 1, 2 and 3).
 - 2) The wording of Policy IE2 part D should be amended to permit change of use to specialist forms of housing, inclusive of PBSA, co-living and build to rent.

