

**MATTER 7 – DESIGN AND
AMENITY, TALL
BUILDINGS AND
HISTORIC ENVIRONMENT**

**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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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 7 – DESIGN AND AMENITY, TALL BUILDINGS AND HISTORIC ENVIRONMENT

Issue: Whether the Plan in relation to design, tall buildings and the historic environment is justified, effective and consistent with national policy and in general conformity with the London Plan.

Policy D1

Q2. Will the requirement to prepare a joint masterplans and/or design codes for sites in multiple ownership be effective in bring sites forward for development?

- 2.1 Camprop do not consider this requirement effective or deliverable. Site allocation reference S10 is in multiple ownership with Bangor Wharf and Eagle Wharf held under separate ownerships. Whilst there are active plans to redevelop Bangor Wharf, we understand the owner of Eagle Wharf has no plans or desire to redevelop their site in the short term. It is therefore unclear why the requirement to prepare a joint masterplan for the entire allocated site is required if it is clear one party, will not come forward. This requirement could potentially stifle development on the part of the allocated site that is available to come forward.
- 2.2 An alternative preferred and suggested approach is to ensure that if one part of the site can come forward first, then it should not prejudice future development on the remainder of the allocation site.

Q3. Does the policy requirement for major development to contribute to the Citizen Scientist programme meet the tests required for S106 agreements (necessary to make the development acceptable in planning terms, directly related to the development, fairly and reasonably related in scale and kind to the development) and is it justified?

- 2.3 Camprop admires the desire to seek contributions to this boroughwide programme but it does not consider the requirement for a blanket contribution, falls within the remit of S106 obligations for development sites.
- 2.4 A contribution to the Citizen Scientist Programme would not meet the statutory CIL Regulation 122 tests for the following reasons:
- An obligation must address a planning harm that would otherwise make the development unacceptable. It is not identified what harm would be addressed.
 - There must be a clear, direct connection between the development and the obligation being sought. The direct connection is unclear.
 - The obligation is excessive in scale to small and medium sites, such as site allocation S10.
- 2.5 The obligation is not justified and should be deleted in its entirety from Policy DS1 to make it sound.

Modifications

Q23. Are any modifications required for soundness?

- 2.6 Yes. To ensure deliverability of housing sites, which is a key requirement of the NPPF, the policy requirement for joint masterplans for sites in multiple ownership should be removed from the Plan.

- 2.7 The requirement for major sites to contribute to the Citizen Scientist Programme does not meet the CIL Regulation 122 tests and should be removed in its entirety to make the plan sound.

