

**MATTER 9 – CLIMATE  
CHANGE & THE  
ENVIRONMENT**

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**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]  
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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 9 – CLIMATE CHANGE & THE ENVIRONMENT

**Issue: Climate Change: Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to climate change.**

### **Q3. How will the requirements of Policy CC2 affect the delivery of relevant allocated sites?**

- 2.1 Policy CC2 is considered particularly onerous to the delivery of development on allocated sites, such as site allocation S10. Where it is clearly evident that buildings are vacant and have reached the end of life, it seems an unnecessary time and financial burden to require developers to provide a condition and feasibility assessment and development options appraisal.

### **Q4. What are the implications of Policy CC2 of the viability of development? What evidence is there to support this?**

- 2.2 Policy CC2 has a considerable impact on the viability of development. Firstly, through the cost and time requirements of having to explore the potential of retaining buildings and secondly, the inherent development risk that some or all buildings may need to be retained and converted which often does not represent best or efficient use of the site, as required by the NPPF.
- 2.3 If buildings are retained there is significant upfront cost challenges which may require expensive upgrades in energy performance, accessibility and structural safety. Other challenges include technological integration and environmental design constraints which can increase capital costs, impacting short-term project viability.
- 2.4 Furthermore, retention of existing buildings is often problematic when trying to meet quality assurance standards and can impact the ability of owners to get adequate insurance further down the line.

### **Q8. Are any modifications required to economic policies in the Plan required for soundness?**

- 2.5 Yes. Policy CC2 should be amended to provide an exception to the requirements of CC2, where a building has been vacant and derelict for more than 10 years. Where this is the case, it is highly unlikely that a building will be structurally, environmentally or commercially suitable for re-use and therefore removing the requirement of CC2 will assist with the overall viability and deliverability of site allocations, such as S10 (Bangor Wharf & Eagle Wharf).

