

Camden Local Plan Examination

Hearing Statement prepared by DP9 Ltd on behalf of Folgate Estates Ltd

13 March 2026

Introduction

1. This Hearing Statement has been prepared by DP9 Ltd on behalf of Folgate Estates Ltd in response to Examination Document ED04: Matters, Issues and Questions (MIQs), published by the Inspectors on 30 January 2026.
2. It is submitted following earlier representations to the Regulation 18 and 19 stages of the London Borough of Camden's ("LBC") Local Plan in the context of Folgate Estates ownership of Site Allocation C3 'Murphy Site' ("the Site"). The Site represents one of Camden's most significant opportunities to deliver new homes, modern industrial space, and high-quality public realm.
3. Since those representations were submitted, Folgate Estates has continued to engage with LBC on the emerging proposals for Site Allocation C3, for a mixed-use masterplan comprising the re-provision of the existing industrial floorspace, alongside the potential for a significant number of new homes (which could be up to 1,800 based on the latest design-led pre-application scheme), new open space and associated works. It is anticipated that the application will be submitted at the end of 2026. The emerging Local Plan and its policies are therefore highly relevant and will be a material consideration in shaping the forthcoming masterplan for the Murphy Site.
4. This Hearing Statement reinforces Folgate Estate's strong support for the principle of the allocation for comprehensive mixed-use redevelopment of the Site, but requests modifications to Allocation C3 to ensure the policies are justified, effective, and consistent with national policy. These changes would enable the Site to be optimised through a design-led masterplanning process and remain sufficiently flexible to support its successful delivery.
5. It is noted that the MIQs do not identify any specific, site-related questions for Allocation C3 under Issue 3: Central Camden, within which the Site is located. Accordingly, this Hearing Statement responds to Issue 1 which covers all site allocations, and addresses only the key questions relevant to the Applicant and the soundness of the allocation.



Matter 10: Site Allocations and Area Based Policies

Issue 1: Site Allocations

Question 1 (c) How the boundaries and extent of the site have been defined and justified;

1. The 'Site Plan' for Allocation C3 (page 117 of the Draft Local Plan) currently includes the global headquarters of J Murphy & Sons (JMS) who have occupied this building for several decades and anticipate continuing in its occupation for many years to come. Although the land is under Folgate Estates (the same shareholders as JMS) ownership, pre-application discussions to date and the future planning application will not include this part of the site to safeguard its ongoing operational use. As such, its inclusion within the allocation boundary for C3 is not justified and the boundary should be amended to exclude the JMS headquarters (and the site area updated accordingly).
2. Part 29 of Allocation C3 states that future development "*must deliver improvements to Greenwood Place*" [emphasis added]. However, Greenwood Place lies outside both the proposed allocation boundary and the ownership of Folgate Estates. It is therefore not justified or effective to require development within Allocation C3 to deliver works on land that is neither within the allocation or under the control of the applicant. This requirement should be removed to reflect landownership constraints and the limits of the allocation boundary.

Question 1 (g) For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified;

3. For clarity, Folgate Estates is currently in pre-application discussions with LBC for a mixed-use masterplan providing a significant quantum of new homes which could be in excess of the 750 identified in the site allocation (potentially up to around 1,800) and reprovision of the existing industrial floorspace (c. 16,600 sqm GEA/ c. 15,900 sqm GIA). The current identified indicative capacity of 750 homes in Allocation C3 of the Draft Local Plan derived from the Kentish Town Planning Framework (adopted 17th July 2020).
4. Although not finalized, the higher number of homes than the indicative capacity has been justified through an ongoing design-led pre-application process that is appropriate to the local context and is achievable without compromising the full reprovision of existing industrial floorspace in accordance with London Plan policy and flexibility is required as part of the site allocation to enable the appropriate balance of uses to come forward.

Question 1 (t) Any modifications that are necessary for reasons of soundness.

5. Part 1 of the 'Development and Design Principles' for Site Allocation C3 requires an "*employment-led*" development including the "*significant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses*". Additionally, Part 4 requires the development to "*intensify industrial provision to increase or at least maintain, industrial storage and warehousing capacity, and provide for other high density employment uses.*" [emphasis added].
6. As currently drafted, Allocation C3 pre-determines the balance of uses in a way that is not effective or consistent with London Plan industrial policies E4 and E7. The London Plan "*encourages*" boroughs to "*explore the potential*" for intensification and to consider



co-location where appropriate, but it does not require industrial intensification on every designated industrial site, nor does it require redevelopment to be employment-led. The only strategic policy requirement is to resist any loss of industrial floorspace capacity.

7. As currently drafted, the allocation wording goes beyond simply “*acknowledge[ing] the opportunity to intensify employment uses at these locations*” and instead risks constraining the development site’s ability to help meet housing targets, contrary to Paragraph 9.42 of the Draft Plan and undermining the deliverability of comprehensive redevelopment.
8. It is also important to recognise the Site’s existing lawful planning position, which currently benefits from unrestricted industrial and open storage uses. This represents a viable and valuable fallback position, meaning any masterplan redevelopment proposal must be supported by a policy framework that provides a realistic, flexible and deliverable alternative to the existing lawful use.
9. In summary, the current allocation wording is overly prescriptive and risks undermining the effectiveness of the Plan. The Local Plan should be sufficiently flexible enough to allow the balance of uses to be determined through a design-led and collaborative masterplanning process in line with the strategic policy direction. For these reasons, we consider that part of the allocation as drafted are not justified, not effective, and not fully consistent with national policy. To be sound, Allocation C3 should be updated to remove the employment-led requirement and instead require a “mixed-use” masterplan that delivers no net loss of industrial floorspace as a minimum, while “encouraging intensification where feasible”. The appropriate balance of uses residential and commercial uses should be able to be demonstrated at the planning application stage subject to the detailed design and masterplanning process, and the allocation should allow for a broad spectrum of commercial uses, including, for example, hotels and healthcare facilities given the scale of the site.

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