

**MATTER 10 – SITE
ALLOCATIONS**

**CAMDEN COUNCIL
LOCAL PLAN
EXAMINATION**

Bangor Wharf, Georgiana Road

Hearing Statement by Carter Jonas

On behalf of Camprop

March 2026

Carter Jonas

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Client: Camprop

Client or Job Number: J0098185

Contacts: Katy Davis and Jennifer Turner (Carter Jonas)

[REDACTED]
[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 10 – SITE ALLOCATIONS

Issue 1: Whether the preferred site allocations and area based policies are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.

For each proposed development site, please set out:

- a. The background to the site allocation and how it was identified;**
 - 2.1 For the Council to answer.
- b. How the site contributes to delivering the spatial strategy;**
 - 2.2 For the Council to answer.
- c. How the boundaries and extent of the site have been defined and justified;**
 - 2.3 It is unclear how the boundaries and extent of the site allocation S10 are justified. In our representations submitted in June 2025 we outlined that Bangor Wharf and Eagle Wharf are in separate ownerships and are highly unlikely to come forward together. Camprop consider that each site should have its own site allocation to reflect land ownership.
- d. The uses to be permitted and how they are justified;**
 - 2.4
 - 2.5 Camprop consider that the Bangor Wharf part of site allocation S10 is suitable for housing but greater flexibility should be applied above and beyond self-contained homes to allow for more specialist forms of housing to be delivered, such as PBSA, co-living and build to rent. This is due to challenging market conditions with the delivery of traditional residential development in terms of demand, costs and viability.
- e. For housing proposals, the anticipated housing capacity, how this was determined and is it justified;**
 - 2.6
 - 2.7 Camprop is aware of the capacity study for the site allocation S10 prepared by the council's planning policy team. Camprop does not consider it be realistic or viable. The modelling assumes the retention of existing buildings with extensions above which is likely to be impossible due to insufficient structural foundations to bear additional weight and the viability of such a scheme would simply not work. It appears to have very little commercial or viability input.
- f. For employment proposals, the estimated floorspace and whether it is justified;**
 - 2.8 Camprop does not consider Site Allocation S10 suitable or viable for significant amounts of employment space.
- g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified;**
 - 2.9 Camprop's recent scheme that was presented to Development Management officers as part of pre-application discussions in March 2026, was for a PBSA scheme with 157 rooms with communal/public facilities at ground floor. This is currently a viable scheme for the Site but other forms of specialist housing are also being explored.

h. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary;

- 2.10 There are many technical constraints associated with the Site including physical constraints such as the proximity to the canal, a small area of surface water flood risk, an underground trunk sewer, trees and extensive heritage constraints. These constraints restrict what can be built on Site and where which in turns affects the viability of the Site.

i. Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan;

- 2.11 Camprop generally supports the site specific requirements in Site Allocation S10 but has the following comments to make:
- Design principle 2 requires that S10 is taken forward in a coordinated way, working jointly with other landowners. Camprop understand that there is no intention by the owner of Eagle Wharf to redevelop their site in the short term and therefore, it is unclear how easily this principle can be complied with.
 - Design principle 8 requiring utilisation of the canal during operation could be an unnecessary burden to the delivery of development.
 - The reuse of the granite setts (no.13) could be possible subject to their condition being of a standard and quality that allows for insurance of the scheme at a later date.

j. How any site-specific recommendation on building heights is justified on terms of local context;

- 2.12 Camprop has reviewed the design capacity study prepared by Camden Council for Bangor Wharf and does not consider it feasible or deliverable. The proposal involves the retention of the buildings with extensions above. The buildings are in a poor condition and are unlikely to have the structural integrity or foundation depth to support building above. Furthermore, building above on the long 'L' shape building is in close proximity to the rear of the locally listed houses on Royal College Street and is unlikely to be acceptable from a residential amenity perspective.

k. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

- 2.13 The site suffers from a small amount of surface water flooding which can be adequately addressed through the preparation and submission of a Flood Risk Assessment and Drainage Strategy.

l. Is the approach of the Plan to air quality matters relating to planned growth sound?

- 2.14 Camprop supports the Council's commitment to improve air quality across the borough.

m. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met;

- 2.15 The statutory provisions relating to heritage will be met through the site allocation.

n. Evidence of the expected timescale and rate of development, and whether they are realistic;

- 2.16 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 permanent self-contained homes in 2032/33. Camprop contends that this is

not a realistic proposition as the current proposal on Bangor Wharf is for PBSA, as the Site is highly constrained to provide self-contained homes whilst also not a viable use now, or within the plan period.

- 2.17 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 both Bangor Wharf and Eagle Wharf by 2032/33 is unlikely. 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.

o. The highways implications of the site, including accesses and the effect on the highway network;

- 2.18 In Camprop's latest proposal for the Site, a development would be car free, given the excellent PTAL of the site. There would be no adverse impact on the highway network.

p. The known necessary infrastructure dependencies and whether the assumptions relating to them and their delivery are reasonable and consistent with the delivery assumptions contained in the submitted housing trajectory. Is the infrastructure required upfront and what are the timescales for delivery?;

- 2.19 Site allocation S10 does not require upfront infrastructure to allow for redevelopment.

q. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes;

- 2.20 Not relevant to site allocation S10.

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period.

- 2.21 See paragraphs 2.18 and 2.19 above.

s. The situation with regards land ownership, land assembly and developer interest;

- 2.22 Bangor Wharf and Eagle Wharf are owned by two separate landowners. Camprop understands there is no active development intent from the landowner of Eagle Wharf and therefore that part of the allocation is not likely to come forward in the short term.

- 2.23 Camprop are actively looking to redevelop Bangor Wharf and a pre-application meeting with Camden's Development Management team was held in early March 2026 in relation to a proposed PBSA scheme on the Site.

t. Any modifications that are necessary for reasons of soundness.

- 2.24 Yes. Camprop respectfully recommend the following modification for soundness:
1. Split Eagle Wharf and Bangor Wharf into their own site allocations.
 2. Amend the proposed land use to include specialist forms of housing such as PBSA, co-living or Build to Rent.
 3. Provide greater flexibility over the use of the canal mooring during operation, and the re-use of granite setts should be subject to the setts being up to standard and undamaged.

Issue 2: South Camden

Whether the proposals for South Camden are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.

Site Allocation S10

Q19. What are the site constraints facing this site and to what extent is this reflected in the policy requirements?

- 2.25 The Site is heavily constrained by planning and heritage designations, physical infrastructure constraints and by the Site's own planning history. The last proposal for redevelopment on the Site to residential use was refused in June 2017 with 18 reasons for refusal and was subsequently dismissed at appeal in 2018.
- 2.26 Camprop does not consider that the Site's turbulent planning history has been adequately conveyed or considered in the site allocation. The application from 2017 and dismissed appeal clearly demonstrate the Site is not suitable for permanent self-contained homes and yet there appears to be little flexibility in the wording to provide alternative forms of housing such as PBSA, co-living or build to rent, which still meet a local and London-wide need and help to increase the availability of housing stock overall. Camprop respectfully request that the addition of specialist housing is added to the proposed allocated land use within the wording of site allocation S10.

Q20. What evidence is there to demonstrate that housing can be delivered on the site?

- 2.27 Camprop considers that some form of housing can be delivered on the Site but it might not be self-contained housing. Feasibility testing has confirmed that PBSA, co-living and built to rent could viably work. Therefore, Camprop respectfully requests that the policy is made more flexible to include specialist forms of housing that might sit outside the C3 use class, such as PBSA, co-living and build to rent. The risk with not including greater flexibility in the wording, is that the Site may remain vacant and undeveloped for yet another decade. The Site first had a site allocation 2013 and 13 years later it still does not have an implementable planning consent.

Q21. How will multiple ownership of the site effect delivery?

- 2.28 Bangor Wharf and Eagle Wharf are in separate ownerships. Eagle Wharf is in commercial office use and is occupied. We understand that the landowner of Eagle Wharf has no active plans to redevelop their part of the site allocation in the short term.
- 2.29 Camprop does have plans to redevelop Bangor Wharf and has recently sought pre-application advice on a proposed PBSA scheme. Camprop considers that there is no reason why Bangor Wharf cannot be redeveloped in isolation so long as the redevelopment does not prejudice development coming forward on Eagle Wharf in the future. Camprop's ultimate preference is to have the two sites within two separate site allocations because of the different landownership. This will help with deliverability.

Modifications

Q25. Are any modifications required for soundness?

- 2.30 Yes. Camprop requests the following modifications are made to Site Allocation S10 for soundness:
1. Separation of Site Allocation S10 into two site allocations - Eagle Wharf and Bangor Wharf – to provide increased certainty and improve the prospects of deliverability.
 2. Greater flexibility should be provided in the wording of the proposed use within S10. The requirement for self-contained housing should be amended to include specialist forms of housing such as PBSA, co-living and build to rent.

