

EXAMINATION OF THE LONDON BOROUGH OF CAMDEN LOCAL PLAN

HEARING STATEMENT FOR FRASERVIEW INVESTMENT (CAMLEY STREET) LIMITED

MATTER 10 – SITE ALLOCATIONS AND AREA BASED POLICIES

MARCH 2026

Prepared By



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1.0 Introduction

- 1.1 This Hearing Statement is submitted on behalf of Frasersview Investment (Camley Street) Limited [the **Landowner**], who holds a long leasehold interest in no.106 Camley Street which forms a significant portion of Site Allocation S6 (104–114 Camley Street and Cedar Way Industrial Estate). The Landowner's Regulation 19 representations were submitted by NTA Planning LLP in June 2025 [representor reference No: 585].
- 1.2 Since those representations were submitted, the Landowner has agreed heads of terms with a specialist developer to bring forward a comprehensive mixed-use scheme at 104–106 Camley Street. This Hearing Statement is submitted by the Landowner and reflects the emerging scheme being progressed by the selected developer.
- 1.3 The Statement addresses Matter 10, Issue 1 (Q1a–t) as applied to Site Allocation S6, and Matter 10, Issue 2, Q14 (compatibility with the adjacent aggregates transshipment facility).
- 1.4 The Landowner supports the principle of Site Allocation S6 and its allocation for new homes and employment uses. However, the allocation as drafted requires modification to ensure it is positively prepared, justified and effective, particularly in relation to the range of residential typologies recognised; the methodology for measuring housing delivery; guidance on managing the aggregates depot constraint; and the flexibility necessary to deliver a viable scheme.

2.0 Matter 10, Issue 1: Site Allocation S6

Q1(a) – Background to the site allocation and how the site was identified

- 2.1 Site S6 has been identified through a well-established evidence base, including the Camley Street Neighbourhood Plan (2021) and the Council's Canalside to Camley Street Supplementary Planning Document (SPD). Both documents provide a clear vision for high-density, mixed-use regeneration of the eastern side of Camley Street. The site sits within the emerging Knowledge Quarter (KQ), a nationally significant cluster of research, science, academic and cultural institutions anchored at King's Cross and extending to Camden Town and Euston.
- 2.2 The allocation is broadly well-founded. However, the evidence base does not adequately address the role of Purpose-Built Shared Living (co-living) as a deliverable and appropriate residential typology for this location. This is a material gap which undermines the soundness of the allocation as currently drafted.

Q1(d) – Uses to be permitted and justification

- 2.3 The emerging scheme for 104–106 / 108 Camley Street proposes a mix of purpose-built shared living ("PBSL") (also known as co-living units) (sui generis) along with self-contained Class C3 homes. Purpose-built shared accommodation with private en-suite rooms and shared communal facilities is not 'self-contained housing' in the conventional planning sense. Accordingly, as drafted, S6 could be interpreted as excluding PBSL which would prejudice the emerging proposals which has been well received by the Council in early pre-application discussions.

2.4 Co-living is recognised by The London Plan (2021) as legitimate and growing housing typology, particularly suited to high-accessibility, employment-rich locations of the kind represented by Site S6. Camden's own draft Local Plan strongly encourages the provision of intermediate rent housing and its housing needs evidence identifies growth in single-person households as a key demographic trend over the plan period. The Knowledge Quarter context of this site makes it an exemplary location for an innovation-linked PBSL offer that can meet this identified need. The Knowledge Quarter context of this site makes it an exemplary location for an innovation-linked PBSL offer.

2.5 The emerging scheme also proposes workspace and a range of commercial uses to support both the wider Knowledge Quarter eco-system as well as existing and new workers and residents. Principle 6 of S6 lists acceptable employment uses but it should be made clear that this list is not exclusive in order to ensure that the policy framework provides sufficient flexibility for development to meet the evolving needs of the wider area.

Modification required:

2.6 The allocated use should be amended to explicitly include Purpose-Built Shared Living (co-living) as an acceptable residential typology. Principle 6 should be amended to make it clear that the list of acceptable employment/commercial uses should not be interpreted as a closed list.

Q1(e) – Housing capacity justification

2.7 The indicative housing capacity of 750 additional self-contained homes requires qualification. The figure is expressed solely in terms of Class C3 dwellings, which creates a fundamental ambiguity where PBSL is proposed as part of the mix.

2.8 Without acknowledgement of the PBSL equivalence methodology in the allocation, the emerging scheme risks being assessed as failing to meet the housing capacity target which could prejudice the site coming forward and the significant employment and housing benefits it would deliver.

Modification required:

2.9 The indicative housing capacity should be amended to confirm that PBSL units can contribute to delivery targets using the GLA's 1.8:1 equivalence methodology, and that the 750 home figure reflects C3-equivalent delivery across the whole allocation.

Q1(s) – Land ownership, assembly and developer interest

2.10 Principle 8 of S6 requires development to mitigate the impact of existing noise, air quality and other nuisance in accordance with the Agent of Change principle. Principle 16 requires proposals not to prejudice the continued operation of the aggregates transshipment facility. These are appropriate requirements, but as drafted they give insufficient guidance on the expected scope of technical assessment. This issue is addressed further at Section 3 below and should be acknowledged in the Site Allocation.

2.11 The Landowner's interest in Camley Street forms a significant portion of the S6 allocation and they have agreed heads of terms with a specialist developer to bring forward a comprehensive mixed-use scheme which deliver a substantial part of the allocation. The emerging proposals have been the subject of positive discussions with the Council and represent a collaborative

approach between the landowner and an experienced specialist developer demonstrating clear intent and deliverability.

- 2.12 The emerging scheme has been developed in close coordination with the masterplan principles established through Sites A (120–136 Camley Street) and B (3–30 Cedar Way), and in dialogue with other adjacent landholders. Pre-application discussions with Camden have confirmed in-principle support for the integrated approach, the landscape-led masterplan strategy and the residential/commercial mix of uses.
- 2.13 However, Principle 2 of S6, which requires a 'coordinated approach working jointly with other landowners', could as drafted be invoked to resist or delay a phased approach to delivery. The allocation should be clarified to confirm that individual sub-parcels can come forward sequentially, provided they accord with the masterplan principles established through the SPD and Neighbourhood Plan and do not prejudice the comprehensive development of the wider allocation.

Modification required:

- 2.14 Principle 2 should be amended to confirm that phased or parcelled delivery is acceptable where schemes are consistent with an overarching masterplan framework and do not prejudice the wider allocation.

Q1(n) – Expected timescales and rate of development

- 2.15 A planning application for the emerging scheme is anticipated in 2026/27 and, subject to consent, delivery could commence within the first five years of the plan period, consistent with the housing trajectory for S6.
- 2.16 The interdependency between the emerging scheme and the wider Camley Street regeneration is material to delivery. The affordable homes programme at Site A (Camden's Community Investment Programme) is part-supported by the viability of the consented commercial development at 3-30 Cedar Way such that a deliverable scheme for the remainder of the site allocation is a necessary enabler of the Council's own housing and regeneration priorities for the area.
- 2.17 The urgency of housing delivery at S6 is reinforced by the Housing Delivery Test. Camden delivered only 53% of its housing target in the 2023 measurement period, the most recent published results, triggering the presumption in favour of sustainable development under NPPF paragraph 11(d). Where that presumption applies, permission should be granted unless any adverse impacts significantly and demonstrably outweigh the benefits, having particular regard to policies for making effective use of land and providing affordable homes. Significant weight must therefore be given to housing delivery in decision-making, further underlining the importance of an allocation that is genuinely deliverable and does not exclude viable housing typologies such as PBSL.

3.0 Matter 10, Issue 2: Question 14 – Compatibility with the Aggregates Facility

- 3.1 Camden's Planning Committee resolved to grant full planning permission for 282 homes at Site B (3-30 Cedar Way) which forms part of Site Allocation S6 in January 2026.
- 3.2 The Committee Report (ref. 2025/4364/P) identifies the safeguarded aggregate site on Freight Lane as a potential noise source for new residents at paragraph 13.17. In response to the Agent of Change assessment at paragraphs 13.24–13.27 the local planning authority concluded that the noise environment had been robustly assessed, and that appropriate noise mitigation to the residential units would be secured by planning condition. The GLA also confirmed as part to its Stage One representations that suitable mitigations in relation to noise and vibration would be robustly secured in accordance with the Agent of Change principle as set out in London Plan Policy D13.
- 3.3 This demonstrates that Camden and other key stakeholders have already concluded that residential development within the S6 allocation boundary is compatible with the adjacent railway infrastructure and the nearby aggregates facility, subject to appropriate design measures. There is no basis on which to reach a different conclusion for the remainder of Site Allocation S6 which shares the same policy framework, the same physical context and the same constraints.

4.0 Summary of Modifications Sought

- 4.1 Following on from the above, the following Main Modifications to Site Allocation S6 are requested:
- (i) Amend the 'Allocated Use' description to add reference to Purpose-Built Shared Living ("PBSL") as an acceptable residential typology where it contributes to meeting housing needs, including the provision of affordable intermediate housing.
 - (ii) Amend the 'Indicative Housing Capacity' to confirm that PBSL units contribute to the housing capacity target using the GLA's co-living to C3 equivalence methodology (currently 1.8:1), and that the 750 homes figure reflects C3-equivalent delivery across the whole allocation.
 - (iii) Amend Principle 6 to make it clear that the list of acceptable employment and commercial uses is not a closed list.
 - (iv) Amend Principle 2 to confirm that individual sub-parcels within the allocation may come forward in phases, provided they are consistent with the wider masterplan principles for the area, and do not prejudice the comprehensive development of the wider allocation.

5.0 Conclusions

- 5.1 The Landowner supports the allocation of Site S6 for comprehensive mixed-use development and the Council's ambition to deliver new homes, employment floorspace and public realm as part of the wider regeneration of Camley Street. The site is well-located within the Knowledge

Quarter, benefits from good public transport accessibility, and there is a committed landowner with an experienced developer actively progressing proposals for a substantial part of the allocation.

- 5.2 The planning permission recently granted for the northern part of the Site confirms that the policy framework and physical constraints of this location are capable of supporting high-quality, high-density mixed-use development. There is no reason why the remainder of Site Allocation S6 should be treated differently. However, the allocation as drafted does not adequately recognise Purpose-Built Shared Living as an acceptable residential typology, does not provide a clear methodology for measuring PBSL delivery against the housing capacity target, and does not give sufficient certainty on phased delivery.
- 5.3 These are matters of soundness as the allocation risks being ineffective and insufficiently justified if they are not addressed. With Camden's (and London's) current housing, the Plan cannot afford an allocation that inadvertently constrains deliverable and viable housing typologies.