



Date: 16/03/2026
Our ref: TfL/PfL/VSH/AR – CamdenMIQ26

London Borough of Camden

By email: CamdenLPPO2025@outlook.com

Dear Ms Butcher

**CAMDEN NEW LOCAL PLAN
INSPECTORS MATTERS, ISSUES AND QUESTIONS
PLACES FOR LONDON STATEMENTS ON MATTER 10, ISSUE 2**

Thank you for the opportunity to respond to the Inspector's Matters, Issues and Questions (MIQs) relating to the Draft Camden Local Plan, and for granting the extension to the deadline

We are writing to provide our Statements in response to **Matter 10: Site Allocations and Area Based Policies, Issue 2: South Camden.**

Places for London (Places) is Transport for London's (TfL) property company. It manages TfL's commercial property assets and develops its surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations. Places for London submitted a representation to the Regulation 19 consultation on the draft Local Plan on 27 June 2025.

Please note that the attached Statements on **Matter 10, Issue 2** reflect the views of Places' planning and design team in its capacity as a significant landowner, developer and landlord only and are separate from any responses that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided separate representations during earlier stages of the Plan's preparation in respect of TfL-wide operational, land-use planning and transport policy matters.

In line with the Inspector's guidance, we have not repeated the full detail of our Regulation 19 representation within these Statements. We respectfully ask that the Inspector considers the points raised in our Regulation 19 Local Plan submission — including the recommendations and suggested wording it contains in relation to draft policies H2 (Maximising the supply of self-contained housing), CC2 (Prioritising the retention of existing buildings), D2 (Tall buildings), and draft Site Allocation CI7 – **Camden Town OSD** — together with our response to the relevant Matters, Issues and Questions, and in particular the draft Site Allocation SI3: **Former Thameslink Station, Pentonville Road**.

Should the Inspector require any further clarification, my colleague Luke Burrough and I remain at their disposal.

Yours faithfully



Hermine Sanson
Planning Manager, Places for London

cc.
Patricia Cazes-Potgieter, Places for London
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ISSUE 2: South Camden

Site Allocation SI3

22. Are the identified uses for the site justified and appropriate?

The identified uses in the draft allocation are only partially appropriate and justified.

We refer the Inspector to our Regulation I9 response (Site Allocation SI3, pages 2-4) which sets out this matter in full. In our view, the current wording is too limited and would not enable a viable or optimal development scheme to come forward. The reduced site boundary - compared with the Regulation I8 version of the draft Local Plan - now includes only the former ticket hall building. It excludes 366 Gray's Inn Road and the rail and Underground tracks, all of which form part of the joint TfL and Network Rail landholding.

A comprehensive decked-over development solution is feasible and has been explored through previous 2017 feasibility work and technical studies. The allocation should therefore allow flexibility and recognise the potential for a wider red-line boundary.

The land-use mix also requires broadening. While we note the inclusion of employment uses and permanent self-contained homes within the allocation, the operational context—including live rail and Underground infrastructure and adjacent late-night venues—may constrain the delivery of conventional Class C3 housing.

Student accommodation and hotel use are likely to be more compatible and viable. Hotel use also supports job creation. We therefore recommended that the site allocation provides an appropriate degree of flexibility regarding the exact mix of uses. Specifically, the allocation should be expanded to include:

- Hotel use
- student accommodation (PBSA)
- ground-floor retail/F&B to activate Pentonville Road.

This approach also aligns with draft Policy H9 (Purpose-Built Student Accommodation), which supports an appropriate range of non-conventional accommodation, and with draft Policy IE5 (hotel), which supports hotel uses in locations with an established commercial or mixed-use character in the Central Activities Zone.

23. Are tall buildings justified in this location?

Yes—subject to design-led assessment—tall buildings are justified and appropriate in this location. We refer the Inspector to our Regulation I9 response, which provides full detail on this matter.

The site sits within the Central Activities Zone (CAZ), has exceptional PTAL 6b accessibility, and occupies a prominent position on Pentonville Road, immediately adjacent to the King's Cross/St Pancras Opportunity Area. These characteristics support higher-density development in principle.

Draft Policy D2 (Tall Buildings) provides a robust framework for assessing proposals above Camden's tall building thresholds, including in areas not specifically identified as suitable for tall buildings. Under Policy D2 Part C, taller buildings may be supported where they meet requirements relating to design quality, heritage, townscape character, and public benefits.

Given the engineering and viability challenges associated with over-track development, an optimised massing strategy may require a taller built form. A sensitively designed, stepped

building could also enhance wayfinding and legibility along Pentonville Road and help mark the site's strategic transport function.

Overall, a taller element can be justified where it responds appropriately to heritage and townscape considerations; delivers public benefits; and supports the allocation's requirement for a *design-led approach to achieving the optimum amount of development*.