



Quod

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## **R22 Local Plan**

# **Additional Viability Testing Hearing Statement**

**(Draft Policy  
CC6 / Doc Ref:  
ED67)**

## **Camden Local Plan**

St George West  
London Limited

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29<sup>TH</sup> APRIL 2026

# Additional Viability Testing

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- 1.1 On behalf of St George West London Limited ('St George'), Quod submits this hearing statement in response to the additional viability testing of proposed submission draft Policy CC6 Energy Use and the Generation of Renewable Energy (Document Reference ED67).
- 1.2 This hearing statement should be read in conjunction with St George's Matter 11 Hearing Statement (ED65) issued to the Inspector on 13<sup>th</sup> March 2026.

## Overview

- 1.3 Page 12 to 83 of ED67 test C3 typologies of 30, 135 and 200 homes (typology 9, 13 and 15). The Council states that the three typologies set out in Table 3.1.1 were chosen to *"reflect a range of development densities and scale of development and build costs commensurate with these differences"*.
- 1.4 The Council have not provided any justification to exclude Typology 'Resi 16' (575 flats) as set out in Table 4.3.1. of Camden's Whole Plan Viability Assessment (EB01). This should be included to provide the uppermost range for analysis of Draft Policy CC6, which still remains well below some of the largest applications in the borough that contribute towards strategic housing needs.
- 1.5 Each table comprises 6x11 outputs (66 outputs), and each page contains 5 tables, totalling 330 outputs per page. Across 71 pages, there 23,430 outputs to decipher, but there is no reasonable summary to understand this data beyond a short narrative (Paragraph 6.7) that might not fully reflect the outputs. This is not a transparent approach expected by Framework guidance.
- 1.6 Our high-level analysis of the cumulative results within ED67 suggests that c.50% of outputs are unviable. This is no basis to support these policies which will impact delivery, despite the claim at Paragraph 6.8 that *"the application of Policy CC6 is unlikely to have a significant impact on the delivery of development and new homes in the Borough"*.
- 1.7 Viability appears reliant on lower value existing land uses (office/community use or secondary industrial), and/or higher value residential areas (areas like regents Park and Central Kings Cross), a combination of which is not very common in Camden. Two of Camden's largest regeneration sites (Landsec O2 and Camden Goods Yard) are located on sites in higher existing retail use, yet this is absent as a BLV assessed as part of ED67.
- 1.8 It appears from the tables that cumulatively, there are many scenarios where the cumulative policies are not viable generally, and the majority fail to demonstrate viability at 35-50% affordable housing.
- 1.9 Table 5.6.1 suggests that the additional criteria (CC6 A2-A4) add £130/sqm to £140/sqm cumulatively, and there are many viability failures. When applying the Written Ministerial Statement entitled 'Local Energy Efficiency Standards Update' on 13 December 2023 the efficiency standards go beyond current or planned buildings regulation (and London Plan

Policy SI2) requiring immediate operational performance. The policy should be rejected because the evidence does not have a well-reasoned and robustly costed rationale that ensures that development remains viable, and the impact on housing supply and affordability is not considered in accordance with the National Planning Policy Framework.

- 1.10 The results re-enforce our overall concern that the policy burden on development in Camden is unviable in many scenarios, therefore change is required, including a variation to the 35-50% affordable housing threshold.

## Detailed Comments

- 1.11 Paragraph 1.1 states the Submission Draft Camden Local Plan (SDCLP) *“identifies how many new residential units and jobs are required to support Camden's population”*.
- 1.12 We have raised concern that the Plan does not support Camden's population.
- 1.13 Paragraph 1.4. states *“The LPRVS found that the sustainability and climate change policies in the Plan will increase base build costs by 7.75% to 11.75%. The study noted that whilst the impact of these additional costs will vary between schemes and between locations within the borough, this is shown to result in a reduction in the amount of viable affordable housing deliverable of up to 5% - 10% in the development typologies tested”*
- 1.14 This reduction is significant and should be clearly explained in the Local Plan. It also excludes abnormal costs which can double base build costs, with a similar reduction in affordable housing, which again are not reported in the Plan.
- 1.15 Paragraph 2.11. states *“Policy SI 2 requires that major developments achieve a minimum 35 per cent on-site carbon reduction over Part L 2021. Residential developments are expected to be able to exceed this, and so an additional benchmark has been set that residential developments should be aiming to achieve. The benchmarks may be updated periodically to include additional building types and to reflect improvements in performance over time”*.
- 1.16 This does not usefully explain what the additional benchmark is and should be clarified.
- 1.17 Table 5.6.1 (*Summary of costs associated with Policy CC6*) suggests that the additional criteria (A2-A4 of Policy CC6 ) adds approximately £130/sqm to £140/sqm. Cumulatively, this results in many viability failures and failures against the Written Ministerial Statement because development does not remain viable without impact on housing supply and affordability.
- 1.18 Paragraph 6.2 states *“In the LPRVS, CDM identified that the cumulative cost of the Council's requirements towards sustainability and climate change policies supporting and delivering sustainable developments, minimising carbon emissions, energy use and requiring the generation of renewable energy onsite reflected a total cost ranging from 7.75% to 11.75% of base build costs”*
- 1.19 It should be noted that this excludes abnormal costs, and where these arise (most brownfield sites) the impact is far greater.

- 1.20 Paragraph 6.3 notes that Policy CC6 A4 of CC6 incurs a cost of 0.75% of base build costs. Cumulatively, this reflects a range of 4.25% to 5.75% of base build costs for draft Policy CC6. It should be noted that this excludes abnormal costs, and where these arise (most brownfield sites) the impact is far greater.
- 1.21 Paragraph 6.6. states: *“The LPRVS found that the impact of the sustainability and climate change policies in the Plan have an opportunity cost/result in a reduction in the amount of viable affordable housing deliverable of up to 5% - 10% in the development typologies we have tested”*
- 1.22 The results of ED67 reinforce St George’s wider concern that the proposed policy will create significant viability challenges for development. This points towards further modifications, including the revision to the 35-50% affordable housing threshold as stated within our Matter 11 Hearing Statement (ED65) which indicated results of EB01 did not point to any level of affordable housing that most schemes can viably deliver.
- 1.23 Paragraph 6.7 states: *“Our further viability testing of the costs associated with Policy CC6 (criterion A2 – 3 and A4), in isolation from the other sustainability and climate change policies, indicates that in a number of scenarios, the impact of Policy CC6 results in an opportunity cost, reducing the amount of viable affordable housing deliverable by up to circa 5%. However, we also note that in some instances, the cumulative application of Policy CC6 in combination with the other policy requirements does not reduce the viability to the next lowest 5% affordable housing band”.*
- 1.24 This is a very broad statement without any effective summary/conclusions of the outputs assessed. It would be helpful for the Council to summarise and explain whether the cumulative policy burden with 35%-50% affordable housing requirement is viable in the zones tested at EB01 Table 4.5.1 (extract below) to be more effective. This should use the 4 BLVs<sup>1</sup> identified within ED67.
- 1.25 This helpful summary has been produced by the same author for the Hounslow Local Plan Review (**Appendix 1**) which we include for reference. It would be helpful to have this chart colour coded red and green (or other) to show above and below the 35% threshold.

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<sup>1</sup> Higher Value Secondary Offices, Medium Value Secondary Offices, Lower Value Secondary Offices / Community Spaces, and Secondary Industrial/Storage/Distribution.

Table 4.5.1 Average sales values adopted in appraisals

**Table 4.5.1: Average sales values adopted in appraisals**

CIL Zone	Market Value Area	£ per sq ft	£ per sq m
CIL Zone A	Kings Cross Lower, Zone 1 and Eastern Central Value Zone	£1,600	£17,222
CIL Zone A	Kings Cross development Higher	£1,750	£18,837
CIL Zone A	Lower Central Zone	£1,900	£20,452
CIL Zone A	Medium Central Zone	£2,250	£24,219
CIL Zone A	Higher Central Zone	£2,450	£26,372
CIL Zone B	Zone 2 and Zone 4 (Lower)	£900	£9,688
CIL Zone B	Zone 2 and Zone 4	£950	£9,688
CIL Zone B	Zone 2 and Zone 4	£1,000	£10,226
CIL Zone B	Zone 2 and Zone 4	£1,050	£10,764
CIL Zone B	Zone 2 and Zone 4 (Medium)	£1,100	£11,302
CIL Zone B	Zone 2 and Zone 4	£1,150	£11,840
CIL Zone B	Zone 2 and Zone 4	£1,200	£12,379
CIL Zone B	Zone 2 and Zone 4	£1,250	£12,917
CIL Zone B	Zone 2 and Zone 4 (Higher)	£1,300	£13,455
CIL Zone C	Zone 3 excluding periphery of Regent's Park (Lower)	£1,050	£11,302
CIL Zone C	Zone 3 excluding periphery of Regent's Park	£1,150	£12,379
CIL Zone C	Zone 3 excluding periphery of Regent's Park	£1,350	£14,531
CIL Zone C	Zone 3 excluding periphery of Regent's Park (Medium)	£1,500	£16,146
CIL Zone C	Zone 3 excluding periphery of Regent's Park	£1,750	£18,837
CIL Zone C	Zone 3 excluding periphery of Regent's Park	£1,900	£20,452
CIL Zone C	Zone 3 excluding periphery of Regent's Park	£2,000	£21,528
CIL Zone C	Zone 3 excluding periphery of Regent's Park (Higher)	£2,250	£24,219
CIL Zone C	Zone 3 Periphery of Regent's Park (Higher)	£2,450	£26,372

Appendix 1 - Hounslow Local Plan EBV1 WPVA Example

