



Quod

R22 Local Plan
Matter 1:
Procedural and
Legal
Requirements

Camden Local
Plan

St George West
London Limited

MARCH 2026

1 Overview and Summary

- 1.1 On behalf of St George West London Limited ('St George'), part of the Berkeley Group, Quod submits this hearing statement in respect of Matter 1: Procedural and Legal Requirements. This hearing statement responds to Matters Issues and Questions (MIQs) (ED04) issued by the Inspector on 30th January 2026.

Overview

- 1.2 St George is currently developing the Camden Goods Yard site located on Chalk Farm Road, NW1 8EH (the 'Site'), the second largest development site in the borough. Detailed planning permission was first granted for redevelopment on 15th June 2018. Following the grant of planning permission, St George commenced delivery of the original permission and has invested very significantly in the Site to date.
- 1.3 St George's redevelopment proposals for the Site provide an excellent opportunity to assist the Council with significant housing delivery and employment growth and regeneration as well as addressing some of the key issues that it is facing across the borough.
- 1.4 Across London, St George is delivering housing led regeneration from several large strategic sites. It is well versed in the application of London Plan policy and the Camden Local Plan, and the effectiveness of these policies.
- 1.5 In accordance with the Framework, the Berkeley Group undertakes early and proportionate engagement in plan making. Recently it has been extensively involved in the Ealing, Hounslow and Newham Local Plan reviews and where relevant, applies some of the Inspector findings to its submissions in respect of the Camden Regulation 22 Local Plan (the 'Plan').
- 1.6 St George submitted representations to the Plan at Regulation 18 ('R18') and 19 ('R19') stage. It is not apparent that the Plan has been updated or revised to respond to these representations. Despite requests to meet, the Council has not accepted, and no statement of ground is proposed.

Summary

- 1.7 This hearing statement should be read in conjunction with the hearing statements submitted for Matters 2, 3, 4, 5, 6, 7, 10 and 11.
- 1.8 For ease, and for the relevant Hearing Statements, we set out a summary of the strategic matters raised across all of our hearing statements below at **Appendix 1** to ensure that they are read in context. These raise concerns regarding soundness and effectiveness¹ of the Plan as a whole.

¹ Framework (February 2025), paragraph 16 & 36

2 Matter 1: Procedural and Legal Requirements

Issue: Whether the Council has complied with the relevant procedural, legal and other requirements

Q3: What is the plan period and how is it justified?

- 2.1 The Framework² states that strategic policies should look ahead over a minimum 15-year period from the date of adoption to anticipate and respond to long-term requirements and opportunities.
- 2.2 The submitted Camden Local Plan (SD02) sets a plan period starting in 2026 and ending in 2041. It's strategic policies are drafted on this basis.
- 2.3 PINS recently published its 'Local Plans Pre-Examination Checklist' in September 2025. The accompanying footnote 17 at Paragraph 3.2 ('Plan Period') confirms that "*it should be assumed that the plan will be adopted no earlier than one year after the date on which it is submitted for examination, and that the 15 year period starts on the 1st April following the date of adoption.*"³
- 2.4 Given that the Plan was submitted for examination in October 2025, the earliest realistic adoption date would be from October 2026 onwards.
- 2.5 In accordance with the PINS Pre-Examination Checklist this would inform a start date of 1st April 2027. Consequently, the effective plan period would operate from 2027 to 2042.
- 2.6 On this basis, the Plan period should be amended to '2027-2042' to address the 15-year minimum period required the Framework⁴. This may require the Council to update its evidence base to incorporate the period. This approach has been implemented elsewhere.

Q5: Does the Plan clearly distinguish between strategic and non-strategic policies? Are strategic policies limited to those necessary to address the strategic priorities of the area and any relevant cross-boundary issues?

- 2.7 The Inspector will take his own view, but it is unclear how the choice of strategic / non-strategic policies aligns with Framework Paragraph 21, 29 and 36 and 37.

² Framework (February 2025) Paragraph 22

³ PINS - Pre-examination checklist for local plans prepared under the Planning and Compulsory Purchase Act 2004 - 23rd September 2025

⁴ Framework (February 2025) Paragraph 22

Q6: In terms of existing and proposed Supplementary Planning Documents (SPD):

- 2.8 Appendix 2 of the Council's Local Development Scheme (SD11) provides a comprehensive list of x21 adopted Supplementary Planning Documents (SPDs), which offer additional detail to facilitate the implementation of the Council's approved policies. Many of these are now dated, ranging from 5 to 8 years old, and it is unclear whether they remain up to date. We note that the Council also refers to x8 planning frameworks and briefs, a number of which are also dated.
- 2.9 Although there are currently no proposed SPDs indicated, it should be noted that local planning authorities will not be able to adopt new SPDs under the Planning and Compulsory Purchase Act 2004 after June 30, 2026. This relates to the broader plan-making reforms introduced by the Levelling Up and Regeneration Act (2023).

Q7(d): How were the options considered through the Sustainability Appraisal for the following:

- 2.10 Paragraph 33 of the Framework expects local plans to be informed throughout their preparation by a sustainability appraisal that meets relevant legal requirements.
- 2.11 Section 4.2 of the Council's Sustainability Appraisal (SD03) sets out the emerging preferred approach to deliver a minimum of 11,550 additional homes over the plan period to 2041. This factors in the London Plan 2021 ('LP2021') target of 1,038 homes per year for the first three years of the plan period (2026/27 – 2028/29), tailing off significantly afterwards.
- 2.12 This housing requirement is a capacity-based figure which has been set with regards to out of date paragraph 4.1.11 of the London Plan, which states that boroughs can draw on the 2017 SHLAA findings and any local evidence of identified capacity in consultation with the GLA. However, the Mayor of London has confirmed to Camden that paragraph 4.1.11 of the LP2021 is "now considered out of date"⁵ and should not be relied upon to inform post-2029 housing capacity.
- 2.13 In this context, a continued reliance on paragraph 4.1.11 of the LP2021 risks embedding an out of date housing requirement that is already known to under-state the borough's (and London's) strategic housing needs and will imminently be replaced through the next London Plan, anticipated for adoption in 2027. This is acknowledged by paragraph 4.146 of SD03, which notes that "Camden's new Local Plan housing target would only be in place for a very short period of time" due to the GLA's intention of adopting the new London Plan in 2027.
- 2.14 The next iteration of the London Plan will adopt the Government's Standard Method, increasing London's housing target to 88,000 homes per year. Camden's minimum housing need is identified as 3,137dpa.
- 2.15 SD03 Table 3.1 Key Sustainability Issues for Camden recognises that "*since 2017 the number of new homes being approved has fallen below the number needed to meet the housing target*" (page 26); "*Camden is one of the least affordable places to live in the UK*" (page 28); and "*The*

⁵ SD18 General Conformity Statement, 12th June 2025 (page 2)

average house in Camden costs around 21.4 times the London median income. This is a higher house price to income ratio than both London (13 times) and England and Wales (9 times) (Median house prices, London Data Store / Land Registry)" (page 28). Table 3.2 The SA Framework seeks to "Provide adequate housing completions to meet local needs" as well as promoting healthy communities; and tackle poverty and social exclusion. It also recognises that "Delivering new homes is a priority for the Council and, to this end, self-contained housing is the priority land use in both the existing and new Local Plan"; and suggest that "Developers have little interest in building homes even though it is the use with the greatest need" (paragraph 4.30).

- 2.16 SD03 paragraph 4.3 recognises the legal requirement to examine reasonable alternatives (RAs) taking into account the objectives and geographical scope of the plan.
- 2.17 SD03 paragraph 4.10 onwards refers to the Quantum of Housing, and "how many new homes are needed (regardless of capacity to provide them)?" However SD03 defaults immediately back to its predetermined capacity led approach of 11,550 additional homes over the plan period to 2041, recognising that "The housing target in the draft Local Plan is lower than the existing housing target for Camden in the London Plan, which if rolled forward, would equate to delivering 15,570 additional homes over the plan period (a difference of 4,020 homes)." (paragraph 4.17). In the same paragraph it argues that "in the absence of a new London Plan housing target the Council has opted for a capacity-based approach as, due to the limited availability of land in Camden, sufficient sites are not available to deliver the number of homes needed to meet the London Plan target if it was rolled forward".
- 2.18 Table 4.1: The reasonable alternative growth scenarios does consider a "higher growth scenario" of 12,850 homes, calculated as the London Plan target for the first three years of the plan period (1,038 x 3) plus the London Plan SHLAA figure for the latter 12 years (811 x 12), but this is discounted. As this related to the R18 plan, paragraphs 4.151 onwards refer to further higher growth scenarios of 14,600 homes (including a 1,720 home backlog); and 15,570 homes (a rollover of the London Plan target of 1,380dpa). The standard method is discounted, unreasonably, at paragraph 4.154.
- 2.19 SD03 Section 4.3 'Growth scenarios appraisal' 'Homes' paragraph 4.160 – 4.165 are ambiguous. It concludes that none of the options will meet housing need in full; delivering more homes will lead to higher densities and more one bedroom homes "would not meet identified need" (which isn't correct). With regards to significant effects, "all options are considered to have a 'limited or uncertain' positive effect". The fundamental issue here is that housing need in the Borough has not been adequately assessed. EB10 Camden Local Housing Needs Assessment uses a pre-determined capacity figure. Paragraph 1.2 states that "The proposed Camden Local Plan sets a housing target of 11,550 dwellings over the 15-year period 2026-2041. This study treats this figure as the dwelling target and seeks to understand the mix of housing which is required within this total". The standard method, the Government's calculation of Housing Need of 47,055 homes (3,137 dpa x 15 years) has been disregarded⁶.

⁶ PPG Housing and economic needs assessment confirms that the National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method set out below identifies a minimum annual housing need figure and

2.20 SD03 has therefore failed its duty to consider how many new homes are needed (irrespective of capacity); has failed to consider the Standard Method, required by the Framework; and has failed to consider the significant adverse impacts of failing to meet its housing needs as required by the Framework⁷. The Framework requires plans to be prepared in a manner that is “*aspirational but deliverable*”⁸. In context of the above the Council’s approach to establishing housing targets across the plan period is of critical importance, and at a minimum, Local Plans must be underpinned by robust, contemporary evidence of need, and must reflect the evolving national and London-wide policy context. Without clear alignment to its assessed housing need, the Plan risks under-delivery and cannot be considered in accordance with the Framework⁹.

Q27: Overall, is the Plan in general conformity with the London Plan and how is that evidenced?

2.21 The Statement of Common Ground (SD19) between the Greater London Authority (GLA) and the Council establishes that the Mayor is of the view that the current draft Plan does not demonstrate general conformity with the London Plan, primarily due to the proposed housing targets for the duration of the Plan.

2.22 The Council’s target to deliver 11,550 new dwellings equates to approximately 770 homes per annum. This is 35% less than the 2017 target and only 25% of the target of 3,137 homes per year based on the Government’s calculation method. Housing targets should be revised upwards to positively respond to this.

2.23 Additionally, this figure does not account for the cumulative backlog from the under-delivery of completed homes since 2019/20, which is estimated by SD03 at around 1,720 homes by April 2026.

2.24 According to the Council’s General Conformity Topic Paper (TP01), this issue is regarded as one of soundness rather than general conformity, citing consistency with paragraph 4.1.11 as their rationale regarding the housing target.

2.25 The Mayor also notes in the context of working towards delivering 88,000 homes per annum as calculated at a national level through the standard method, the approach taken under paragraph 4.1.11 is now considered to be out of date. TP01 states that while Paragraph 4.1.11 may be considered outdated for decision-making purposes, it remains operative until an alternative methodology is introduced by the new London Plan.

2.26 In line with the GLA’s recommendations in SD19, the Council is advised to extend the current LP2021 housing target of 1,038 homes per year beyond 2028/29, incorporating any outstanding shortfall. However, the Council state within TP01 that as these recommendations are not set out in the London Plan 2021, it cannot fail as a general conformity matter.

ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. (para 002)

⁷ Framework (February 2025) Paragraph 33

⁸ Framework (February 2025) Paragraph 16

⁹ Framework (February 2025) Paragraph 61

2.27 To proactively enhance housing supply, we agree with the GLA that as a minimum the LP2021 target is adopted beyond 2028/29. Moreover, we encourage the Council to align its approach to setting housing targets in recognition of the standard method requirement of 3,137 dpa, which will take effect upon adoption of the new London Plan.

3 Appendix 1: Summary and Overview

- 3.1 Our concerns regarding soundness and effectiveness¹⁰ of the Plan as a whole are summarised below.
- 3.1.1 The Plan has been prepared under the previous Framework (December 2023) but published for consultation under the new Framework (December 2024), without the necessary updates (see paragraph 1.7.3 footnote 2 below).
- 3.1.2 At 580 pages overall, the Plan does not appear to have been drafted as a catalyst for development, and to respond positively to the housing needs of the borough.
- 3.1.3 The Plan is inconsistent where it applies flexibility within policy, and / or within supporting text. Given the evidenced viability and delivery challenges, flexibility through the consideration of viability should be embedded into policy. Supporting text does not carry the same weight as policy, particularly in the judgement of compliance with s.38(6) of the PCPA 2004¹¹.
- 3.1.4 The Plan fails to meet PINS guidance, and the Plan period should be adjusted to 1st April 2027.
- 3.1.5 The Plan fails to accurately calculate its objectively assessed housing needs. EB10 Camden Local Housing Needs Assessment confirms that it has been set a predetermined dwelling (capacity) target of 11,550 homes for the 15 year plan period.
- 3.1.6 The Plan fails to assess unfettered needs and does not adopt and assess the Standard Method¹² of housing need, required by the Framework¹³; the Council's Sustainability Appraisal (SD03) does not properly test a scenario of meeting these needs, or identify/consider whether significant adverse impacts arise from failing to meet these needs as required by the Framework¹⁴.
- 3.1.7 SD19 (GLA SoCG) suggests that *"The Council considers that it has done all it reasonably can to identify land for housing in the Local Plan and optimise site capacity, to maximise housing supply"*. There is limited evidence to support this statement.
- 3.1.8 The Plan (SD14) does not demonstrate a 5YHLS, required by the Framework¹⁵, even with a reduced housing requirement. In December 2025 the Council agreed¹⁶ that its

¹⁰ Framework (February 2025), paragraph 16 & 36

¹¹ Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

¹² EB 10 Camden Local Housing Needs Assessment May 2025, paragraph 1.8 states *"For Camden, this (Standard Method) yielded an annual need figure of 3,137 dwelling per annum in December 2024. This is clearly a very substantial change, and this report was developed and written under the NPPF 2023 and therefore has not incorporated any of the changes to the NPPF."*

¹³ Framework (February 2025), paragraph 62

¹⁴ Framework (February 2025), paragraph 33

¹⁵ Framework (February 2025), paragraph 72

¹⁶ S78 Appeal Statement of Common Ground APP/X5210/W/25/3369926

housing land supply is 2.8 years when applying the requirements of the Framework. Some of the assumptions that inform housing land supply do not reflect the most up to date evidence, and the Framework definition of deliverable¹⁷.

- 3.1.9 The Council fails the Housing Delivery Test, with a published result of only 53%.
- 3.1.10 The Plan is already out of date. Technically it fails the 5YHLS test and effectively fails to acknowledge the boroughs and London's housing emergency lacking any new stimulus required to significantly boost housing. Housing delivery under the adopted plan has been poor, has not met needs and the Plan largely replicates the constraining policy framework of the adopted plan, with limited retrospective review into the effectiveness of its policies and deeper understanding why its AMR KPIs have failed¹⁸. It benchmarks housing delivery up to 2028/29 against the London Plan¹⁹, but this plan is out of date as of 2nd March 2026, being 5 years since adoption without review²⁰, and the housing need figure for London has changed significantly. This is acknowledged by paragraph 4.146 of SD03, which notes that "*Camden's new Local Plan housing target would only be in place for a very short period of time*". However, it then proposes to reduce housing delivery. If adopted, the Plan should contain an immediate review recognising that its policies have been prepared on a fundamentally different housing need, and weight reduced accordingly.
- 3.1.11 EB01, the Whole Plan Viability Appraisal April 2025 (WPVA) does not, as required by the Viability PPG, demonstrate realistic and deliverable policies that are likely to come forward for development over the plan period, even before accounting for significant exclusions from the WPVA such as abnormal costs²¹. The adoption of a 50% strategic target for sites is not deliverable, and the Plan does not propose a deliverable affordable housing target.
- 3.1.12 The WVPA does correctly recognise lack of deliverability and promotes flexibility "*both in terms of tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing*"²². It proposes use of the London Plan Viability Tested Route²³ within Plan Policy H5 to overcome lack of deliverability.
- 3.1.13 The WPVA and its appendices are 1790 pages long. Appendix 2 '*residential appraisal results*' is 384 pages long each of which contain c.385 outputs (c.150,000 outputs in total). The PPG on viability was updated on 16th December 2025 to include reference to the responsibility of landowners, site promoters and developers to engage in plan making. We note that there has been no Council engagement on the WPVA. We also

¹⁷ Framework (February 2025), paragraph 72 (a) and glossary

¹⁸ AMR (2024) for the period 2021/22 and 2022/23 evidences failure of Meeting Housing Needs Indicator 1: 'To deliver 1,038 net additional homes per year to meet the housing target set for Camden in the 2021 London Plan'; and Housing Indicator 2: 'To deliver 353 additional affordable homes per year to meet the borough strategic target of 5,300 additional affordable homes from 2016/17 – 2030/31'.

¹⁹ We recognise that Planning and Compulsory Purchase Act 2004, section 24(1)(b) requires that '*The local development documents must be in general conformity with ... the spatial development strategy (if the local planning authority are a London borough)*'.

²⁰ Framework (February 2025), paragraph 34 and 78

²¹ EB01 paragraph 4.61 and 4.62

²² EB01 paragraph 1.7, bullet 2.

²³ London Plan Policy H5 (F) Threshold approach to applications

note that the PPG states that “A viability assessment should be presented in a way that allows clear interpretation and interrogation of it” (para 009) and “Practitioners should ensure that the findings of a viability assessment are presented clearly and the assessment and its conclusions are objective, reasonable and realistic. An executive summary should be used to set out key findings.” (para 021). We are concerned that the lack of transparent reporting and an absent summary of the total number of red and green cells does not meet PPG expectations for clearly presented conclusions, blurring the findings of the WPVA, and possibly overstating deliverability.

- 3.1.14 Plan Policy H4 correctly includes the flexibility in principle (at part E and F) and this is essential to the soundness of the plan. We consider that this flexibility must be retained, but the text should be revised to refer specifically to the Viability Tested Route.
- 3.1.15 The Plan should also include additional text which recognises the limitations of the WPVA, that the 50% affordable target is not deliverable in the majority of cases, and Plan policies should be applied flexibly to ensure deliverability of the Plan as a whole including for site allocations. Examples of such wording adopted by other Inspectors is provided in our hearing statements. The Plan should also recognise that the maximum reasonable amount of affordable housing delivered by the Viability Tested Route carries equal weight to other routes, particularly as the WPVA demonstrates that it will be used in the majority of cases.
- 3.1.16 Policy IE4 (Affordable Workspace) Policy IE4 is ambiguous. There is limited evidence justifying the “working benchmark” of IE4, which may increase. WPVA does not clearly demonstrate deliverability of the policy. SD13 AMR; EB23 (December 2023) Economic Needs Assessment Camden Council; and LD60 Affordable Workspace Strategy (2023) do not include evidence to justify the benchmark. EB23 evidence that 10% is a normal London requirement (not 20%), subject to viability (e.g Hackney, Brent, Lambeth and Southwark).
- 3.1.17 Policy DS1 (Healthy and Sustainable Development) requirement for contributions towards the Council’s Citizen Scientist community research programme are not justified. Policy D2 (Tall Buildings) should support appropriate building heights and include additional flexible wording recognising the limitations of EB34 (Building Heights Study). Parts C2; C3; C5 and C16 should be deleted. Policy D3(A.3) which requires all new homes to be dual aspect should be deleted.
- 3.1.18 For Site Allocations, of concern paragraph 1.40 suggests that “A lower number (of homes) may be supported where this can be justified”, this should be deleted. Site Allocations (paragraph 1.35 to 1.40) and Chapter 15 Delivery and Monitoring of the Plan are not yet positively prepared and should adopt additional wording (as now incorporated in other Local Plans) which applies flexibly to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme. This approach ensures that the site allocations remain deliverable within the context of sustainable development.
- 3.1.19 The Council’s approach to Site Allocation C7 is inconsistent, introducing an unsound and bespoke individual site requirement to retain affordable housing approved by a previous planning permission. This approach is punitive and conflicts with the Viability

Tested Route of the London Plan and the Plan. The proposed uses should be revised to “Housing (including housing proposed by H1, H4, H8, H9, H10); and main town centre uses given location.

- 3.1.20 Site Allocation C8 proposed uses should be revised to “Housing (including housing proposed by H1, H4, H8, H9, H10); main town centre uses (as defined by Framework glossary) given the location of the site.