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## **R22 Local Plan**

### **Matter 3: Meeting Camden's Housing Needs**

## **Camden Local Plan**

St George West  
London Limited

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MARCH 2026

# 1 Overview and Summary

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- 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 3: Meeting Camden's Housing Needs. 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 1, 2, 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 effectiveness<sup>1</sup> of the Plan as a whole.

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<sup>1</sup> Framework (February 2025), paragraph 16 & 36

## 2 Matter 3: Meeting Camden’s Housing Needs

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**Issue 1: Whether the Plan has been positively prepared and is underpinned by up-to-date and robust evidence, and whether it is justified, effective, consistent with national policy and is in general conformity with the London Plan in relation to meeting Camden’s housing needs.**

**Q1: Is the overall quantity of new homes planned for Camden up to 2041 justified and consistent with national policy?**

**Q2: The Plan sets a borough wide housing requirement of 11,550 new homes during the plan period. Is this justified? If not, what should the housing requirement be?**

**Q3: Having regard to the London Plan 2021 requirement for net housing completions of 10,380 homes for the 10 year period 2019/20 to 2028/29: i) What is the basis for the Plan identifying a housing requirement for the remaining years to the end of the Plan period? ii) What is the justification for departing from the London Plan 2021 housing requirements, how is it supported by evidence, and does it raises any questions about whether the Plan is in general conformity with the London Plan?**

- 2.1 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.
- 2.2 The Plan fails to accurately calculate its objectively assessed housing needs.

### **EB10 Camden Local Housing Needs Assessment May 2025**

- 2.3 EB10 Camden Local Housing Needs Assessment May 2025 confirms at paragraph 1.2 that it has been set a predetermined dwelling capacity of 11,550 homes for the 15 year plan period *“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.”*
- 2.4 The Council has therefore self-imposed itself a housing cap, rather than assessing unfettered housing needs. This cap (11,500 homes / 770 dpa) is less than the out of date London Plan Table 4.1 figure of 1,038dpa (15,570 homes).
- 2.5 EB10 (prepared under the old Framework) dismisses the requirement to consider the Standard Method. At paragraph 1.8 it states that *“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.”*
- 2.6 EB10 goes onto state at paragraph 1.9 that *“On this basis, the figure of 3,137 dwelling per annum is unlikely to become relevant to Camden for planning purposes”*. We disagree.

2.7 This is clearly, now, incorrect as the Plan is submitted under the December 2024 NPPF. The Council has chosen not to update its evidence base. This is neither a justified or positively prepared approach.

## The Standard Method

2.8 The Plan does not refer to, assess or adopt the Standard Method of housing need, required by the Framework<sup>2</sup>.

2.9 PPG Housing and economic needs assessment confirms that the National Planning Policy Framework expects strategic policy-making authorities to follow the standard method for assessing local housing need.

2.10 The standard method identifies a minimum annual housing need figure and ensures that plan-making is informed by “*an unconstrained assessment of the number of homes needed in an area*” (para 002).

2.11 Whilst the Council relies on a subsequent capacity assessment to inform its housing requirement, this does not negate reference to and consideration of the standard method – the most up to date assessment of local housing needs in Camden.

2.12 This is particularly relevant as the Mayor of London (SD18 GLA Statement of Conformity, page 2) refers to its application in the emerging London Plan “*As noted in the Regulation 18 consultation response, the current London Plan does not meet London’s identified need and therefore the overall amount of housing required annually should not be expected to reduce. Whilst the above approach is in line with London Plan paragraph 4.1.11, in the context of working towards delivering 88,000 homes per annum as calculated at a national level through the standard method, this approach (specifically the text in 4.1.11) is now considered to be out of date. Boroughs who are currently working on their Local Plan, such as LBC, should seek, as a minimum, to roll over the current London Plan target beyond 2028/29, including any shortfall accrued to date, and to continue to take proactive measures to increase housing supply.*”

2.13 Application of the Standard Method across 15 years would equate to a local Housing Need of 47,055 homes (3,137dpa x 15 years). The Council’s capacity capped approach equates to 11,550 homes. There is a substantial difference, and we consider that it is unjustified to ignore this.

2.14 The “*unconstrained*” housing need assessment should be reported irrespective of whether the plan can meet this need as required by the PPG “*Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process*” (para 008) and “*Once local housing need has been assessed, as set out in this guidance, authorities should then make an assessment of the amount of new homes that can be provided in their area.*” (para 040). The Standard Method affordability adjustment is applied to take account of past under-delivery. (para 011).

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<sup>2</sup> Framework (February 2025), paragraph 62

2.15 This approach is particularly relevant for the Plan, as the housing requirement that Camden rely on at Table 4.1 of the London Plan up to 2028/29 will be formally out of date on 2<sup>nd</sup> March 2026, being 5 years since adoption without review<sup>3</sup>, and because the housing need figure for London has changed significantly. During this Local Plan review, the draft London Plan will be published with new housing targets for Camden (due May/June 2026), in effect updating Table 4.1 of the London Plan. These will be adopted thereafter.

## The Council's Approach

2.16 The Council's approach to meeting housing needs is neither positive, or effective. The optics of a London Council planning to deliver less housing across the next 15 years, than previous 2019/20 -2028/29 targets, in the current housing emergency, and overseeing a significant shortfall, in the context of many Ministerial Statements to boost housing, is stark, and unjustified.

2.17 CD8.15A: SD14 September 2025 Housing Trajectory and 5YHLS note, Figure 2, now seeks to reduce housing delivery to 703dpa (down from 770dpa) from 2029/30 onwards. The Council suggest that this reduction in housing is due to capacity constraints but there does not appear to be a sound evidence base to support these statements, and it appears a predetermined position. We would welcome greater evidence that the Council has robustly tried to increase housing delivery, and also to address its poor historic record, and the housing shortfall that exists. Other inner London Boroughs have achieved far greater housing delivery results by comparison with similar constraints to those set out at SD03 paragraph 4.155 bullet 1 to 4.

2.18 As we explain in other Matter Hearing Statements, some of those constraints might be self-imposed through excessive policy burden and duplication; viability; affordable housing expectations; capping of building heights and housing as a land use in central locations etc.

2.19 The Council's response to the reality of the revised London Plan targets, due in the summer, set out at paragraph 4.146 of SD03 (Sustainability Appraisal), is that "*Camden's new Local Plan housing target would only be in place for a very short period of time*".

2.20 However, the Plan is already out of date, failing to demonstrate a 5YHLS and the HDT (>75% threshold).

2.21 Effectively, the Plan is seeking to be adopted with policies which rely on a substantially reduced housing capacity for a very short period time. These figures will be superseded, yet the remaining plan policies will not have been positively prepared to deliver the new and increased targets. This is an inherently unsound approach.

2.22 If adopted, the Plan should therefore contain an immediate review recognising that the Plan does not meet housing needs, and weight should be reduced accordingly.

## SD19 SoCG with GLA

2.23 Paragraph 4.2 states that both parties agree that the Camden Local Plan reflects the London Plan 2021 (LP2021) housing targets over the period 2019/20 to 2028/29 (including for small

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<sup>3</sup> Framework (February 2025), paragraph 34 and 78

sites) but that further clarity would be provided by additional reference to the targets for the period to 2028/2029 and post 2029. The SoCG broadly reflects technical compliance of general conformity, but not whether the Plan is effective at meeting housing needs and is sound compliant with the Framework.

## Conclusion

- 2.24 The Plan fails to assess unfettered needs and does not assess the Standard Method<sup>4</sup> of housing need, required by the Framework<sup>5</sup>.
- 2.25 The Council's Sustainability Appraisal (SD03) does not test a scenario of meeting these needs or identify significant adverse impacts of failing to meet these needs<sup>6</sup> as required by the Framework.
- 2.26 Housing delivery under the 2017 adopted plan has been poor, has not met needs yet the Plan largely replicates this constraining policy framework (across 580 pages), with limited retrospective review into the effectiveness of its policies and deeper understanding why its AMR housing KPIs have failed<sup>7</sup>. Whilst the Government's objective is to be explicit in policy that the default answer to brownfield development should be yes, there are 87 pages of planning policy relating to housing delivery compared to 40 pages for all other land uses, and the presumption in favour of housing is absent, despite it being the priority use.

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<sup>4</sup> 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.*"

<sup>5</sup> Framework (February 2025), paragraph 62

<sup>6</sup> Framework (February 2025), paragraph 33

<sup>7</sup> 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'.

**Issue 2: Whether the Plan will be effective in delivering affordable housing to meet the Borough’s needs and in providing an appropriate mix and standard of homes for different groups in the community during the Plan period?**

2.27 The Council’s evidence base (SD13 AMR) demonstrates that the Council’s policies have not been effective in Meeting Housing Needs Indicator 2: To deliver 5,300 (353da) additional affordable homes from 2016/17 – 2030/31, which it has failed to achieve.

2.28 Table 5 of SD13, confirms that affordable housing provision in the borough during the plan period has achieved only 46% of its target.

Table 2-1: Camden Affordable Housing Delivery (Table 5, SD13)

Year	Net Affordable Homes Camden Housing Delivery <sup>8</sup>	Target	Deficit
2017/18	252	353	101
2018/19	266	353	87
2019/20	148	353	205
2020/21	117	353	236
2021/22	120	353	233
2022/23	1	353	352
2023/24	242	353	111
Total		2,471	1,325
	46% of target achieved		

2.29 London data hub affordable housing starts indicate that completions will fall further as they translate during the construction period.

Table 2-2: Camden Housing Starts

Year	All	C3	Other	AH Low Cost Rent	AH – Intermediate	AH Total
2024/25	136	138	-2	17	13	30
2023/24	760	799	-39	286	97	383
2022/23	274	274	0	29	56	85
2021/22	285	293	-8	86	1	87
Total	1455	1504	-49	418	167	585

**Q9: How does Local Plan policy support the delivery of the strategic target and approaches to the delivery of affordable housing set out in Policies H4 and H5 of the London Plan?**

2.30 We consider that Plan Policy H4 should refer to London Plan Policy H5 Threshold Approach to applications within the policy itself.

<sup>8</sup> Government Housing Delivery Test Results

- 2.31 We support Plan Policy H4's approach to the Viability Tested Route, in general conformity with London Plan Policy H5(F).
- 2.32 The Policy does not however set a viable and deliverable affordable housing target for the borough. The evidence does not support either a 35% or 50% affordable threshold.
- 2.33 Even prior to the housing and economic crisis that the Country faces, the evidence demonstrates that the 50% affordable housing target has not delivered this threshold. Table 5 of SD13 suggests an average of 22% affordable provision over the last 7 years.

**Q10: How well is the approach to affordable housing supported by robust evidence of financial viability, having regard to other requirements of the Plan and how clearly does it set out the decision making process for viability?**

**Q31. The Viability Study finds that there is no uniform level of affordable housing that can viably be delivered across the borough. How has the Council ensured that the 50% strategic target is deliverable?**

- 2.34 EB01, the Whole Plan Viability Appraisal April 2025 (WPVA) does not, as required by 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 costs<sup>9</sup>.
- 2.35 The adoption of a 50% strategic target for sites is not deliverable and has not 'pulled up' affordable housing delivery in the borough as the WPVA suggests that it would. *"Setting a lower proportion of affordable housing would likely result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so"*<sup>10</sup> is not credible and there is no evidence of this happening.
- 2.36 The Mayor has advised that *"seeking to apply the strategic target in a site-specific way is an incorrect interpretation of (London Plan) Policy H4"*<sup>11</sup>.
- 2.37 The WVPA correctly recognises 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"*<sup>12</sup>, and use of the London Plan Viability Tested Route<sup>13</sup>, within Plan Policy H4. This is essential to ensure soundness of the plan, and this flexibility must be retained.
- 2.38 However, the Plan does not propose, nor set in policy, an affordable housing threshold that is viable and deliverable, and the Plan should be more effective by acknowledging this.
- 2.39 To conform with the London Plan the affordable % should be calculated in habitable rooms.

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<sup>9</sup> EB01 paragraph 4.61 and 4.62

<sup>10</sup> EB01 paragraph 1.7, bullet 2

<sup>11</sup> SD18 General Conformity Statement, 12<sup>th</sup> June 2025 (page 2)

<sup>12</sup> EB01 paragraph 1.7, bullet 2.

<sup>13</sup> London Plan Policy H5 (F) Threshold approach to applications

### **Q36. Is reference to flexibility in tenure split sound?**

- 2.40 Plan Policy H4 (B)(6) state that *“in all cases, we will apply a guideline mix of affordable housing types to seek 60% low-cost rented housing and 40% intermediate housing.”* Flexibility is then applied in part E.
- 2.41 EB10 Camden LHNA (2025) paragraph 4.104 confirms that *“Ultimately, the local authority will have to make judgements based on national and London Plan policies and the viability of development. It is unlikely that development in Camden could viably deliver anything like the proportion of affordable homes suggested by Figure 40, so the local authority will have some difficult choices to make in terms of prioritising different needs. Nevertheless, it is hoped that the data in Figure 40 and throughout the study about the range and nature of housing needs will prove invaluable to the local authority in making informed choices”.*
- 2.42 The evidence base supports flexibility and recognises viability constraints. To ensure that the Plan is sound the flexibility within Plan Policy H4 (B)(6) part E should be retained.

### **Q16. When considering optimising sites to deliver housing should paragraph 7.31 of the Plan refer to the Sustainable Residential Quality density matrix?**

- 2.43 We consider that it should not, as this limits housing delivery and the matrix has been deleted from the London Plan.

## 3 Appendix 1: Summary and Overview

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- 3.1 Our concerns regarding soundness and effectiveness<sup>14</sup> 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 2004<sup>15</sup>.
- 3.1.4 The Plan fails to meet PINS guidance, and the Plan period should be adjusted to 1<sup>st</sup> 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 Method<sup>16</sup> of housing need, required by the Framework<sup>17</sup>; 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 Framework<sup>18</sup>.
- 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 Framework<sup>19</sup>, even with a reduced housing requirement. In December 2025 the Council agreed<sup>20</sup> that its

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<sup>14</sup> Framework (February 2025), paragraph 16 & 36

<sup>15</sup> Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

<sup>16</sup> 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."*

<sup>17</sup> Framework (February 2025), paragraph 62

<sup>18</sup> Framework (February 2025), paragraph 33

<sup>19</sup> Framework (February 2025), paragraph 72

<sup>20</sup> 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 deliverable<sup>21</sup>.

- 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 failed<sup>22</sup>. It benchmarks housing delivery up to 2028/29 against the London Plan<sup>23</sup>, but this plan is out of date as of 2<sup>nd</sup> March 2026, being 5 years since adoption without review<sup>24</sup>, 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 costs<sup>25</sup>. 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*"<sup>26</sup>. It proposes use of the London Plan Viability Tested Route<sup>27</sup> 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 16<sup>th</sup> 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

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<sup>21</sup> Framework (February 2025), paragraph 72 (a) and glossary

<sup>22</sup> 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'.

<sup>23</sup> 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)*'.

<sup>24</sup> Framework (February 2025), paragraph 34 and 78

<sup>25</sup> EB01 paragraph 4.61 and 4.62

<sup>26</sup> EB01 paragraph 1.7, bullet 2.

<sup>27</sup> 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.