



Quod

R22 Local Plan

Matter 4: Housing Land Supply

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 4: Housing Land Supply. 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, 3, 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 4: Housing Land Supply

Issue: Whether the Local Plan is justified, effective and consistent with national policy, and in conformity with the London Plan in relation to demonstrating the housing land supply position throughout the plan period.

- 2.1 The Council's evidence base (SD13 AMR) demonstrates that the Council's policies have not been effective in delivering minimum housing requirements.
- 2.2 The Council has failed to meet 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.
- 2.3 A summary of housing delivery is set out below.

Table 1-1: Camden Housing Delivery

Year	Camden Housing Delivery ²	Target	% of target
2024/25	997 ³	1,038	96%
2023/24	508 ⁴	1,038	49%
2022/23	364 ⁵	1,038	34%
2021/22	532 ⁶	1,038	52%

Q1: What is the relevant 5-year period on adoption and what is the 5- year housing land requirement?

- 2.4 PPG Housing supply and delivery Guidance on 5 year housing land supply and Housing Delivery Test states, at the very least, that *"In plan-making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan"*. (paragraph 004).
- 2.5 Our Matter 1 Hearing Statement refers to PINS guidance, which indicates that the Plan period should be adjusted to 1st April 2027. It would be logical that the 5 year housing land requirement follows.
- 2.6 In either scenario the Council's application of the 5 year period from the 1st April 2026 is incorrect.
- 2.7 The accrued shortfall in delivery should be accounted for.
- 2.8 The PPG states that *"authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an*

² Government Housing Delivery Test Results

³ GLA Planning London Datahub

⁴ GLA Planning London Datahub

⁵ SD13 AMR Table 4

⁶ SD13 AMR Table 4

alternative approach” (para 001). The Council has not demonstrated exceptional circumstances.

2.9 Figure 2 and 3 relies on a reduced housing target of 703dpa from 2029/30 onwards. Even then only 2.8 years supply is demonstrated, highlighting the ineffective response the Plan makes to providing sufficient housing land.

Q2: Does the trajectory identify the components of the housing land supply across the plan period with sufficient clarity? Is it based on up-to-date evidence?

2.10 The data in SD14 Figure 1 is ambiguous and should be updated to include estimated homes to be delivered for each site per year.

2.11 Figure 2 and Figure 4 concludes the total for each year, but this lacks the transparency to test the accuracy of the assumptions in Figure 1.

2.12 Figure 2 assumes ‘*total net additional C3 levels*’ not seen in the borough recently (up to 1266 dpa in 2030/31, and 3516 homes in 3 years). This does not correlate with the Housing Starts data produced by the GLA (set out below) which demonstrates substantially less housing at 405dpa, expected to worsen in the housing crisis.

Table 1-2: Camden Housing Starts⁷

Year	Housing Starts
2024/25	137
2023/24	773
2022/23	307
Total	1217 (405dpa)

2.13 We note that Figure 1 & 4 assumes that Site C7 delivers 534 homes across the 5 years from 2026/27 e.g 107dpa. Evidence provided to the Council, should a S78 appeal be approved, is as follows which is different. This assumes 375 homes across the next 5 years (75dpa). If the appeal is not approved the scheme will stall.

Year	Completions
2025	58
2026	149
2027	51
2028	101
2029	52
2030	22
2031	59
2032	59
2033	85
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	636

⁷ London Data Hub (February 2026)

2.14 Some of the assumptions that inform this supply may not meet the Framework definition of deliverable⁸. W2 02 Centre for example, the Council's largest site is subject to review, has not yet been through Gateway 2, and therefore the assumption of housing delivery (Appendix 1 does not yet indicate how many) in 2028/29 is unlikely.

Q3: The Council Housing Trajectory and 5 Year Housing Land Supply Note (SD14) provides 3 different 5 year housing land supply results; 5.2 years, 4.4 years and 2.8 years. Which of the supply results is the Council replying upon for soundness and does this comply with national policy requirements for backlog and a buffer?

2.15 The Plan (SD14) does not demonstrate a 5YHLS, required by the Framework⁹.

2.16 On 3rd November 2025 the Council agreed¹⁰ that its housing land supply is "2.8 years after application of the backlog and the buffer applying the methodology required by the Framework".

Q4: What modifications would be required to make the Plan deliverable in the event that only 2.8 year supply could be shown, with national backlog and buffer requirements on top?

2.17 The Plan should be transparent about the challenges that it faces; apply the presumption; include the flexibility that we have identified in our Matter Statements; and commit to a new positively prepared local plan review. Without this the Plan cannot be found sound.

Q9: Several major sites are at pre-application stage but have nonetheless been included as deliverable (for example, St Pancras Hospital, Royal College Street, Regis Road). What evidence demonstrates deliverability in instances where a site does not have planning permission?

2.18 These sites should be excluded.

⁸ Framework (February 2025), paragraph 72 (a) and glossary

⁹ Framework (February 2025), paragraph 72

¹⁰ S78 Appeal Statement of Common Ground APP/X5210/W/25/3369926 CD10.12, paragraph 8.7

3 Appendix 1: Summary and Overview

- 3.1 Our concerns regarding soundness and effectiveness¹¹ 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 2004¹².
- 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 Method¹³ of housing need, required by the Framework¹⁴; 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 Framework¹⁵.
- 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 Framework¹⁶, even with a reduced housing requirement. In December 2025 the Council agreed¹⁷ that its

¹¹ Framework (February 2025), paragraph 16 & 36

¹² Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

¹³ 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."*

¹⁴ Framework (February 2025), paragraph 62

¹⁵ Framework (February 2025), paragraph 33

¹⁶ Framework (February 2025), paragraph 72

¹⁷ 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 deliverable¹⁸.

- 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 failed¹⁹. It benchmarks housing delivery up to 2028/29 against the London Plan²⁰, but this plan is out of date as of 2nd March 2026, being 5 years since adoption without review²¹, 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 costs²². 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*"²³. It proposes use of the London Plan Viability Tested Route²⁴ 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

¹⁸ Framework (February 2025), paragraph 72 (a) and glossary

¹⁹ 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'.

²⁰ 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)*'.

²¹ Framework (February 2025), paragraph 34 and 78

²² EB01 paragraph 4.61 and 4.62

²³ EB01 paragraph 1.7, bullet 2.

²⁴ 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.