



Quod

R22 Local Plan

Matter 5: Delivering an Inclusive Economy

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 5: Economy. 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, 4, 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 5: Delivering an Inclusive Economy

Issue: Whether the Plan has been positively prepared, is justified, effective, consistent with national policy and in general conformity with the London Plan in addressing the economy and employment needs of the Borough.

Policy IE4 (Affordable Workspace)

Q19: What evidence supports the requirement in A.2 of the Policy which seeks a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent?

- 2.1 No changes are proposed to Policy IE4 under SD50 (Minor Mods) and SD51 (Main Mods).
- 2.2 Policy IE4 (Affordable and Specialist Workspace) requires “*all major schemes (including mixed use developments) providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the delivery of affordable workspace*”, seeking a “*working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years.*”
- 2.3 The Inclusive Economy Topic Paper (TP05) submitted with the R22 Local Plan states that “*the draft policy has been worded in order to be flexible to reflect the different types of employment proposals that come forward in the borough and the clear differentials in land values and rents that exist geographically*”.
- 2.4 Whilst flexibility is supported, Policy IE4 is unhelpfully ambiguous setting a “*working benchmark*”. It does not define this as a maximum. Further Part B states that “*To ensure the opportunities arising from affordable workspace are optimised, the Council will support a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. Any provision must be consistent with the definition of affordable workspace set out in the London Plan.*”
- 2.5 Policy IE4 is absent of how the policy will be applied flexibly and appears to indicate that the policy requirements could increase above “*the working benchmark*”.
- 2.6 WPVA (EB01) requires flexibility “*subject to viability*”. It states that “*We note that draft Policy IE4 in the draft NCLP and its supporting text identify that the Council’s requirement for contributions towards affordable workspace in developments will be considered subject to viability....On this basis we consider that Policy IE4 pragmatically and appropriately allows for the flexible application of its affordable workspace requirements from proposed developments including offices, research and development uses or light industry*”. (Paragraph 1.7, bullet 19, page 6).
- 2.7 The summary assessment of Policy IE4 within the Council’s WPVA (EB01, paragraph 1.7 bullet 16 to 21) suggests that the approach to affordable workspace “*should be achievable in Camden’s main office locations (Central Area / Zone 1 / King’s Cross)*” depending on the existing use value of individual sites, development values and amount of housing required on

site. Only office-led mix use developments in Finchley Road and Swiss Cottage are shown to be viable outside these areas, where higher residential values are secured on sites in lower existing use values. At 856 pages, EB01 Appendix 6 'Commercial-led mixed-use schemes incorporating affordable workspace appraisal results' does not include a summary of the red and green cells to easily understand what is / isn't viable prior to abnormal costs being applied. This doesn't meet the Viability PPG requirements.

- 2.8 Supporting text to the policy (paragraph 9.61) refers to the possibility of “a financial payment in lieu of provision where evidence is provided demonstrating to its satisfaction why direct delivery of the workspace is not feasible. This may include the provision of evidence relating to viability.” Paragraph 9.65 confirms that the Council will negotiate on a case-by-case basis, having regard to site-specific circumstances including scheme viability.
- 2.9 Our concern is because Policy IE4 excludes the critical component of viability, it is unsound. The supporting paragraphs and WPVA evidence how critical viability is to the policy; and it remains unclear whether the terms proposed are deliverable overall, or justified. The ambiguity of the policy and requirement for site specific negotiations (possibly in every scenario) will delay application determination and ultimately delivery. On its face it appears that the policy expectations set are simply too high.
- 2.10 With regards the 'benchmark' of 20% net additional floorspace at 50% market rent, our client's understanding is that affordable workspace secured on schemes in Camden has typically been significantly below 20% of net additional floorspace (~10%), and at rental discounts closer to 80% of market rent. If this reflects prevailing market practice, the IE4 benchmark represents a substantial uplift in policy expectations.
- 2.11 SD13 AMR does not contain a KPI for affordable workspace so it is difficult to consider the effectiveness of the application of policy in respect of adopted Policy E2(f) to date. EB23 (December 2023) Economic Needs Assessment Camden Council (1.7 Affordable Workspace and 8.1 Affordable Workspace) recommends a policy but does not justify IE4. The Council's LD60 Affordable Workspace Strategy (2023) does not include evidence to justify the benchmark policy either. EB23 (paragraph 8.1.4) does refer to comparable boroughs, but this evidences that 10% is normal requirement (not 20%), subject to viability (e.g Hackney, Brent, Lambeth and Southwark).
- 2.12 “Update on Knowledge Quarter and Affordable Workspace Delivery” (22nd July 2025) does not appear to be an examination document yet, and does not justify IE4. It does confirm the following:-
- 2.12.1 Since 2011 the Council has secured contributions towards affordable workspace equivalent of 17,400sqm, but only 3,300sqm has been completed in 15 years across 4 schemes. This would suggest a conversion rate of 19% at 220sqm per annum (paragraph 2.1 and 2.2) which does not appear sound justification. Reference is made to a further 11 consented but there is no detailed assessment of what these deliver compared to IE4 requirements.

Conclusion

- 2.13 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 evidences that 10% is a normal requirement (not 20%), subject to viability (e.g Hackney, Brent, Lambeth and Southwark).

- 2.14 As drafted, Policy IE4 does not include flexibility, and does not refer to viability. If adopted the policy requires modification to ensure soundness because supporting text does not carry the same weight as policy, particularly in the judgement of compliance with s.38(6) of the PCPA 2004², and the WPVA advises that it is necessary to ensure an effective policy.

² Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

3 Appendix 1: Summary and Overview

- 3.1 Our concerns regarding soundness and effectiveness³ 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 2004⁴.
- 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 Method⁵ of housing need, required by the Framework⁶; 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 Framework⁷.
- 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 Framework⁸, even with a reduced housing requirement. In December 2025 the Council agreed⁹ that its

³ Framework (February 2025), paragraph 16 & 36

⁴ Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

⁵ 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."*

⁶ Framework (February 2025), paragraph 62

⁷ Framework (February 2025), paragraph 33

⁸ Framework (February 2025), paragraph 72

⁹ 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 deliverable¹⁰.

- 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 failed¹¹. It benchmarks housing delivery up to 2028/29 against the London Plan¹², but this plan is out of date as of 2nd March 2026, being 5 years since adoption without review¹³, 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 costs¹⁴. 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*"¹⁵. It proposes use of the London Plan Viability Tested Route¹⁶ 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

¹⁰ Framework (February 2025), paragraph 72 (a) and glossary

¹¹ 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'.

¹² 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)*'.

¹³ Framework (February 2025), paragraph 34 and 78

¹⁴ EB01 paragraph 4.61 and 4.62

¹⁵ EB01 paragraph 1.7, bullet 2.

¹⁶ 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.