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**R22 Local Plan**

**Matter 6:  
Supporting  
Camden's  
Communities**

**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 6: Supporting Camden's Communities. This hearing statement responds to Matters Issues and Questions (MIQs) (ED04) issued by the Inspector on 30<sup>th</sup> 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, 5, 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 6: Supporting Camden's Communities

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**Issue: Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to community infrastructure?**

### Policy SC4 (Open Space)

Q7: How does the Policy reflect the expectations of Policy G4 of the London Plan?

- 2.1 London Plan 2021 ('LP2021') Policy G4 states that development plans should undertake a needs assessment of all open space to inform policy and identify areas of open space deficiency. Development plans should also promote the creation of new areas of publicly accessible open space and ensure that open space remains publicly accessible.
- 2.2 Policy SC4 is 3 pages long with 16 limbs.
- 2.3 Policy SC4 (C1) / Table 11 requires public open space provision of 9 sqm per occupier for residential development of all types. We believe that this in addition to the London Plan requirement of private amenity space required for each home (LP Policy D6). Supporting paragraph 10.79 suggests that when it is not possible to provide open space on site, we will consider use of a financial contribution to create usable spaces within the public realm. We haven't been able to locate the evidence base to support how effective the Council has been spending financial contributions on these improvements.
- 2.4 The 9 sqm figure is derived from the Open Standards set out in Table 11 of the R22 Plan (SD02). The Open Space and Sports Topic Paper (TP06) suggest these standards have been found sound at previous examinations, including the current Local Plan in 2017. However, this figure has not been subsequently tested against the shortfall in housing delivery in the borough; the need to deliver a significantly greater number of homes for the borough and its overall effectiveness.
- 2.5 While the principle of securing high-quality, accessible open space is supported, LP2021 Policy G4 indicates that provision should respond to identified local deficiencies, rather than imposing a universal per-occupier requirement for all resident developments that disregards unit types and location.
- 2.6 We consider the proposed quantum is onerous, particularly in relation to the constrained urban regeneration sites which the Council relies upon to justify its reduction in housing, and where the efficient use of land is critical to delivery of housing targets. The blanket application of a per-occupier metric, without flexibility for site-specific circumstances, risks undermining scheme viability and discouraging optimal use of brownfield land.
- 2.7 Draft Policy SC4 should be revised to introduce greater flexibility to ensure that this target is deleted or does not constrain development viability which limits meeting housing needs.

## 3 Appendix 1: Summary and Overview

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- 3.1 Our concerns regarding soundness and effectiveness<sup>2</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>3</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>4</sup> of housing need, required by the Framework<sup>5</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>6</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>7</sup>, even with a reduced housing requirement. In December 2025 the Council agreed<sup>8</sup> that its

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<sup>2</sup> Framework (February 2025), paragraph 16 & 36

<sup>3</sup> Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

<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> Framework (February 2025), paragraph 72

<sup>8</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>9</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>10</sup>. It benchmarks housing delivery up to 2028/29 against the London Plan<sup>11</sup>, but this plan is out of date as of 2<sup>nd</sup> March 2026, being 5 years since adoption without review<sup>12</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>13</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>14</sup>. It proposes use of the London Plan Viability Tested Route<sup>15</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>9</sup> Framework (February 2025), paragraph 72 (a) and glossary

<sup>10</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>11</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>12</sup> Framework (February 2025), paragraph 34 and 78

<sup>13</sup> EB01 paragraph 4.61 and 4.62

<sup>14</sup> EB01 paragraph 1.7, bullet 2.

<sup>15</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.