



Quod

R22 Local Plan

Matter 7: Design and Amenity, Tall Buildings and the Historic Environment

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 7: Design and Amenity, Tall Buildings and the Historic Environment. 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, 5, 6, 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 7: Design and Amenity, Tall Buildings and the Historic Environment

Issue: Whether the Plan in relation to design, tall buildings and the historic environment is justified, effective and consistent with national policy and in general conformity with the London Plan.

Policy DS1 (Healthy and Sustainable Development)

Q3: Does the policy requirement for major development to contribute to the Citizen Scientist programme meet the tests required for S106 agreements (necessary to make the development acceptable in planning terms, directly related to the development, fairly and reasonably related in scale and kind to the development) and is it justified?

- 2.1 We believe that no changes are proposed to Policy DS1 under SD50 (Minor Mods) and SD51 (Main Mods).
- 2.2 Plan Policy DS1(B) and associated supporting paragraphs states that *“the Council will seek contributions from major developments towards the Council’s Citizen Scientist community research programme. Contributions will be secured using Section 106 agreements.”*
- 2.3 The programme is described as delivering community-based training in social science methodologies in partnership with University College London (UCL), with contributions funding research and strategies to inform masterplans and frameworks. The policy and supporting text do not provide sufficient detail regarding the scale of contributions, how they would be calculated, how funds would be spent, or the governance and accountability mechanisms that would apply. Furthermore, Camden’s Infrastructure Delivery Plan (EB43) does not identify this programme as infrastructure required to support development, nor does it quantify funding needs. It does not appear that EB01 WPVA assesses the impact of this contribution.
- 2.4 The Framework² requires planning obligations to be necessary, directly related and fairly and reasonably related in scale and kind. It is not considered that the Citizen Scientist contribution meets these tests. Policy DS1(B) and associated paragraph’s 2.36-7 should be deleted.

Policy D2 (Tall Buildings)

Q4. Is Policy D2 positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan?

- 2.5 SD50 (Minor Mods) and SD51 (Main Mods) do not make changes to Policy D2 which address our representations.

² NPPF Paragraph 58

- 2.6 We support application of London Plan D9 which requires “*appropriate tall building heights should be identified on maps in Development Plans.*” London Plan paragraph 3.9.2 (2.) is out of date.
- 2.7 Policy D2(B) does not yet address the High Court judgement³ on the application of the LP2021 D9 which confirms that Part A or Part B are not pre-conditions (“gateways”) to the operation of Part C, and the acceptability of tall buildings outside defined tall building zones.
- 2.8 Supporting text paragraph 12.31 does not yet recognise the role of EB34 (Building Heights Study). Proportionately as a borough wide assessment, it cannot test tall building suitability at the same level as a planning application. It is also not viability tested, nor does it consider objectively assessed borough needs.
- 2.9 Because London Plan Policy D9 refers to “*appropriate heights*”, sufficient flexibility must be incorporated to enable proposals to be assessed on a case-by-case basis. This reflects the approach taken in other recently examined and adopted Local Plans, such as the Lewisham Local Plan (2025) and the Brent Local Plan (2022), both of which were found sound by the Secretary of State.
- 2.10 These plans include wording that enables tall building heights to be considered beyond the height parameters identified by the borough wide assessment where this is supported by evidence demonstrating compliance with the design-led approach, townscape considerations, and wider planning objectives.

2.10.1 Lewisham Local Plan (Policy QD4, paragraph 5.35)

“Development proposals for building heights that depart from the parameters set by the Local Plan will be considered having regard to relevant material considerations. In such circumstances a wider public benefit must be demonstrated to justify the design of the development”.

2.10.2 Brent Local Plan (Policy BD2, paragraph 6.1.15)

“The heights identified for the Tall Buildings Zones, town centres and site allocations are based on a high level of analysis, rather than in many cases considering a detailed building design. They indicate the heights likely to be generally acceptable to the council. This does not mean that all buildings up to these heights are automatically acceptable. Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location. There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable”.

- 2.11 We suggest that similar wording is introduced within Policy D2 and associated supporting text.

³ R (London Borough of Hillingdon) v Mayor of London [2021] EWHC 3387 (Admin)

2.12 Plan Policy D2 includes 16 matters that the Council “*will give particular attention to*”. We do not consider that part of this approach complies with Framework paragraph 16 (f), in particular:-

2.12.1 C) 2) and 12) adjacent buildings - duplicate each other

2.12.2 C) 3) energy efficient policies – relate to policies not instrumental to tall building design and addressed in the Plan elsewhere.

2.12.3 C) 5) affordable housing policies – relate to policies not instrumental to tall building design and addressed in the Plan elsewhere. Given the housing needs of the borough, if this limb is to remain, it should be revised to refer to maximising the supply of housing overall (Policy H1).

2.12.4 C) 16) biodiversity – relate to policies not instrumental to tall building design and addressed in the Plan elsewhere.

Q6. How has the findings of the Building Heights Study been applied in the Plan and has this been done consistently?

2.13 EB34 identifies Camden Goods Yard (Site Code A506) as a location where tall buildings may be an appropriate form of development, with 12m – 53m considered the potentially appropriate height range.

2.14 The Council has granted planning permission at the site for a development of up to 56m. There is a degree of inconsistency, which is inevitable, albeit the Site Allocation adopts the building heights from EB34 (12m – 53m) rather than those derived following a detailed townscape, heritage and visual assessment.

2.15 We note inconsistency within the Plan which relies upon housing capacity derived from planning permissions in some cases (and to inform the 5YHLS) but excludes the planning permission detail when reporting building heights. This is ineffective.

Q9. Is criterion C.5 of the policy necessary given that the Plan should be read as a whole?

2.16 No, it is not necessary or sound. The Local Plan must be read as a whole, and affordable housing provision is already comprehensively addressed under Policy H4. If the criteria were to remain, then other criteria are required such as viability, and housing needs overall.

2.17 The criteria is inconsistent with LP2021 Policy D9, which makes no reference to the maximisation of affordable housing.

Q10. Is criterion C.9 of Policy D2 (which requires attention to be given to the relationship between building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views) consistent with the requirements of criterion B4 of Policy D1 (which expects development to respect local views and preserve protected strategic views)?

- 2.18 Both Draft Policy D2(C.9) and Policy D1(B.4) require development to safeguard local views and protected strategic views, and there is no meaningful distinction in policy outcome between the two criteria. As drafted, this creates unnecessary duplication within the Plan in contrast to the Framework⁴.
- 2.19 Additionally, LP2021 Policy D9 provides the overarching strategic framework in this regard. Policy D9(C)(1) sets out requirements including assessment of visual impacts, townscape character, and strategic and local views. It already requires proposals to demonstrate that they will not harm protected strategic views and that they appropriately respond to local context.

Policy D3 (A.3) (Design of Housing – Dual Aspect)

Q11: Is it consistent with national policy and in general conformity with the London Plan?

- 2.20 Draft Policy D3 (A.3) requires all new homes to be dual aspect. This is a rigid requirement that risks undermining design-led optimisation, contrary to the principles of the LP2021⁵ and the Framework.
- 2.21 The limitations associated with the rigid application of design guidance have been acknowledged within the GLA’s Homes for London (‘HfL’) emergency measures (October 2025). These measures propose the removal of elements of guidance that restrict housing density and deliverability, in turn, impact viability.
- 2.22 The GLA’s emergency measures sit alongside broader Government planning reforms intended to increase London’s housing delivery. This states that:
- “the rigid application of dual aspect requirements can reduce significantly the number of homes capable of being built within developments” and that “developers should be afforded flexibility in how they approach the design and mix of single and dual aspect dwellings to optimise site layouts”.*⁶
- 2.23 Through this package of emergency measures, the GLA is proposing to withdraw the relevant sections of the Housing Design Standards LPG and update guidance emphasising that developers should be afforded discretion in the application of LP2021 Policy D6, so long as developments are able to demonstrate that dwellings have adequate passive ventilation, daylight and privacy, and avoidance of overheating.

⁴ NPPF Paragraph 16(f)

⁵ Policy D3 of LP2021

⁶ Homes for London (October 2025) – Paragraph 10a.

2.24 Accordingly, Policy D3 (A.3) should be revised to ensure it is consistent with the LP2021 and the emerging updates to London Plan Guidance by incorporating greater flexibility. It is recommended that the specific requirement for all homes to be dual aspect is removed, with policy focusing instead on maximising dual-aspect homes, wherever feasible.

3 Appendix 1: Summary and Overview

- 3.1 Our concerns regarding soundness and effectiveness⁷ 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 2004⁸.
- 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 Method⁹ of housing need, required by the Framework¹⁰; 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 Framework¹¹.
- 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 Framework¹², even with a reduced housing requirement. In December 2025 the Council agreed¹³ that its

⁷ Framework (February 2025), paragraph 16 & 36

⁸ Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

⁹ 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."*

¹⁰ Framework (February 2025), paragraph 62

¹¹ Framework (February 2025), paragraph 33

¹² Framework (February 2025), paragraph 72

¹³ 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 deliverable¹⁴.

- 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 failed¹⁵. It benchmarks housing delivery up to 2028/29 against the London Plan¹⁶, but this plan is out of date as of 2nd March 2026, being 5 years since adoption without review¹⁷, 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 costs¹⁸. 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*"¹⁹. It proposes use of the London Plan Viability Tested Route²⁰ 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

¹⁴ Framework (February 2025), paragraph 72 (a) and glossary

¹⁵ 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'.

¹⁶ 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)*'.

¹⁷ Framework (February 2025), paragraph 34 and 78

¹⁸ EB01 paragraph 4.61 and 4.62

¹⁹ EB01 paragraph 1.7, bullet 2.

²⁰ 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.