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**R22 Local Plan  
Matter 10: Site  
Allocations  
and Area  
Based Policies**

**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 10: Site Allocations and Area Based Policies. 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, 6, 7 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 10: Site Allocations and Area Based Policies

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**Issue 3 (Central Camden): Whether the proposals for Central Camden are positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.**

- 2.1 Site Allocation C7 and C8 are owned by St George and are being brought forward under one planning permission.
- 2.2 The Council propose no changes to Site Allocation C7 or C8 under SD50 (Minor Mods) and SD51 (Main Mods) to address our representations submitted to date.

### General Comments

- 2.3 Concerningly paragraph 1.40 of Site Allocations suggests that *“A lower number (of homes) may be supported where this can be justified, having regard to the overall supply of housing in the borough compared with housing needs and demonstrable needs for other land uses”*. Given the significant housing shortfall in the borough, this sentence should be deleted and replaced with text which states that the indicative housing targets should be met as a minimum and ideally exceeded.
- 2.4 Site Allocations (paragraph 1.35 to 1.40) and Chapter 15 Delivery and Monitoring of the Plan are not yet positively prepared, and do not yet reflect the outputs of the WPVA.
- 2.5 The policy or supporting text should adopt additional wording (as now incorporated in the Newham Local Plan) 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. Full text is suggested in Hearing Statement Matter 2 replicated below.
  - 2.5.1 **BFN 4(3) “Where substantiated financial viability constraints remain, applicants should deliver the maximum viable level of obligations, taking account of site specific considerations and the need to provide any new or improved infrastructure or other mitigation necessary to make the proposal acceptable in planning terms”<sup>2</sup>.**
  - 2.5.2 **Part 2 Site Allocations, paragraph 4.3 “When determining an application, flexibility may be applied 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”<sup>3</sup>.**

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<sup>2</sup> Newham local plan review: ED020 Schedule of Modifications

<sup>3</sup> Newham local plan review: ED020 Schedule of Modifications

## Site Allocation C7 (Morrisons Supermarket)

2.6 Appendix 2 of our R19 propose further changes to the allocated uses to permit “Housing (including housing proposed by H1, H4, H8, H9, H10); and main town centre uses (as defined by Framework glossary<sup>4</sup>)” given the location of the site and its previous retail use.

2.7 We update the allocated uses below to be specific about the living uses.

*“Housing (including housing proposed by H1 (self-contained housing), H9 (purpose built student housing); H10 (Housing with shared facilities); and main town centre uses”.*

2.8 The housing needs in the borough are so significant, and undersupplied, that C7 should not preclude any living use. The London Plan (4.1.09) confirms that ‘*Net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio*’; and ‘*All other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.*’ Housing derived from Plan Policy H9 and H10 contributes to overall needs.

2.9 The Plan should define town centre uses in the glossary. If required this could be streamlined to the following uses: *“Retail development; leisure, entertainment and recreation uses (including cinemas, restaurants, bars and pubs, health and fitness centres); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)”.*

### **Q41. Are the requirements of the Policy consistent with Policies H1(Maximising housing supply), H4 (Maximising the supply of affordable housing) and the London Plan?**

2.10 Site Allocation C7 (Context) notes that the site will make a significant contribution to the Council’s housing supply, with the permitted schemes delivering 644 homes. However, the proposed wording seeking to influence ‘*amendments*’ is not sound, and the second sentence should be deleted as follows.

~~*This site will make a significant contribution to the Council’s housing supply, with the permitted schemes (2017/3847/P and 2022/3646/P) delivering 644 homes. Should any amendments to the scheme come forward, then the Council will expect the supply of housing on this site (including the on-site affordable housing) to be maintained or increased and the key benefits for the wider area to be delivered.*~~

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<sup>4</sup> Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

- 2.11 The draft requirement seeks to impose unlawful controls which are inconsistent with Plan Policy H1, H4, the London Plan and the Framework, preventing the Viability Tested Route, a legitimate policy route.
- 2.12 It is also inconsistent with the approach taken to other site allocations in the Plan. It is not evident that similar wording has been applied across the remaining allocations, raising concerns regarding inconsistency.

**Q42. Is the policy requirement that identifies an appropriate height of 12-53m on the site justified and effective?**

- 2.13 The Site Allocation C7 states within the ‘development and design principles that:

*The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m – 53 m considered the potentially appropriate height range. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.*

*The Council has granted planning permission for a development of up to 56m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development.*

- 2.14 As set out in our response to Matter 7 (Design and Amenity, Tall Buildings and the Historic Environment), there is an inconsistency between the borough-wide methodology in the Building Heights Study (EB34) and the conclusions reached through the detailed, site-specific townscape, heritage and visual impact assessment which supported the grant of permission for a scheme up to 56m.
- 2.15 It is not justified or effective to embed within the allocation a height range (12m–53m) derived from a high-level borough-wide study where a more detailed and recent site-specific assessment has already demonstrated that a greater height (56m) can be accommodated without unacceptable harm and with associated public benefits.
- 2.16 The appropriate height range within Site Allocation C7 should therefore be amended to reflect the 56m height previously found acceptable.
- 2.17 We also note that whilst the allocation relies on housing capacity derived from recent planning permissions, it does not rely on the building heights approved, despite the same principles being applied<sup>5</sup>. This appears inconsistent.

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<sup>5</sup> That decision was based on an assessment of the impacts and benefits of that specific development.

#### **Q43. Is reference to the Camden Good Yard Planning Framework Supplementary Planning Document (SPD) justified and effective?**

- 2.18 Site Allocation C7 states that regard should be had to the visions and objectives of the Camden Goods Yard Planning Framework Supplementary Planning Document (SPD) (2017) when taking forward development of the site. Similarly, Policy C1 (Camden Town) requires development in this location to be taken forward in accordance with the Framework.
- 2.19 While the SPD formed an important part of the original regeneration strategy, it is now approaching ten years old and was prepared under a materially different policy context, including a previous iteration of both the London Plan and the National Planning Policy Framework. It also predates the recent grants of planning permission on the site, which were informed by detailed and updated evidence.
- 2.20 An SPD is non-statutory guidance and cannot introduce new policy requirements. Its weight is therefore inherently limited, particularly where more recent planning permissions and updated Development Plan policies exist.
- 2.21 Furthermore, local planning authorities will not be able to adopt new SPDs under the Planning and Compulsory Purchase Act 2004 after June 30, 2026. This relates to the broader plan-making reforms introduced by the Levelling Up and Regeneration Act (2023). In this context, continued reliance on an ageing SPD without review or formal update risks reducing the clarity and effectiveness of the Local Plan.
- 2.22 If specific visions and objectives within the SPD remain relevant, these should be expressly incorporated into the policy wording of the Local Plan itself, ensuring transparency and statutory weight. Otherwise, reference to this SPD should be deleted.

#### **Q.44 Does part 13 of the policy take a justified approach to access to bus services?**

- 2.23 Part 13 of Site Allocation C7 notes that development should:

*deliver a sustainable long-term solution to minimise the environmental impacts of bus movements on residential amenity and the public realm in the Camden Goods Yard area, whilst ensuring that accessibility to bus services is maintained. The Council will expect applicants to engage with neighbouring landowners and other relevant stakeholders, to establish the optimal location for bus stands, to meet the needs of different users, while ensuring they do not unacceptably intrude upon people's experience and enjoyment of moving through a proposed scheme, including the practicality of alternative locations outside the site.*

- 2.24 Whilst the principle of maintaining public transport accessibility and minimising environmental impacts is supported, the detailed siting of bus stands and associated infrastructure is typically determined through the development management process, in consultation with the Council's highways officers and other relevant consultees.
- 2.25 The requirement as drafted risks duplicating established processes that already occur at pre-application and application stages.

## Site Allocation C8 (Former Morrisons Petrol Filling Station)

### Q45. Are the proposed uses for the site justified?

2.26 Site Allocation C8 states that the appropriate allocated uses are ‘*permanent self-contained homes; employment (offices), retail, food and drink*’. We consider that this approach is overly restrictive given the site’s location within a town centre.

2.27 Appendix 2 of our R19 propose further changes to the allocated uses to permit “Housing (including housing proposed by H1, H4, H8, H9, H10); and main town centre uses (as defined by Framework glossary<sup>6</sup>)” given the location of the site and its previous retail use.

2.28 We update the allocated uses below to be specific about the living uses.

*“Housing (including housing proposed by H1 (self-contained housing), H9 (purpose built student housing); H10 (Housing with shared facilities)); and main town centre uses”.*

2.29 The housing needs in the borough are so significant, and undersupplied, that C8 should not preclude any living use. The London Plan (4.1.09) confirms that ‘*Net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio*’; and ‘*All other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.*’ Housing derived from Plan Policy H9 and H10 contributes to overall needs.

2.30 The Plan should define town centre uses in the glossary. If required this could be streamlined to the following uses “*Retail development; leisure, entertainment and recreation uses (including cinemas, restaurants, bars and pubs, health and fitness centres); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)*”. Town centres use are broad to ensure vitality, viability and optimisation of accessible locations. As a town centre site, the site should be considered appropriate for all living uses.

2.31 In particular, the exclusion of other forms of residential accommodation is not justified. London Plan Policy H15 supports purpose-built student accommodation in appropriate locations, including highly accessible urban centres. Similarly, London Plan Policy H16 supports large-scale purpose-built shared living in areas well connected to local services and employment.

2.32 The adjacent Site Allocation C9 (100 Chalk Farm Road) expressly recognises a broader residential mix, including student accommodation (H9), and planning permission has recently

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<sup>6</sup> Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

been granted for a student scheme. There is no clear justification for treating Site Allocation C8 more restrictively.

- 2.33 Site Allocation C8 should therefore be revised to include all appropriate living uses, together with a broader range of town centre uses, ensuring flexibility and alignment with strategic policy.

### 3 Appendix 1: Summary and Overview

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- 3.1 Our concerns regarding soundness and effectiveness<sup>7</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>8</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>9</sup> of housing need, required by the Framework<sup>10</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>11</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>12</sup>, even with a reduced housing requirement. In December 2025 the Council agreed<sup>13</sup> that its

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<sup>7</sup> Framework (February 2025), paragraph 16 & 36

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

<sup>9</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>10</sup> Framework (February 2025), paragraph 62

<sup>11</sup> Framework (February 2025), paragraph 33

<sup>12</sup> Framework (February 2025), paragraph 72

<sup>13</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>14</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>15</sup>. It benchmarks housing delivery up to 2028/29 against the London Plan<sup>16</sup>, but this plan is out of date as of 2<sup>nd</sup> March 2026, being 5 years since adoption without review<sup>17</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>18</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>19</sup>. It proposes use of the London Plan Viability Tested Route<sup>20</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>14</sup> Framework (February 2025), paragraph 72 (a) and glossary

<sup>15</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>16</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>17</sup> Framework (February 2025), paragraph 34 and 78

<sup>18</sup> EB01 paragraph 4.61 and 4.62

<sup>19</sup> EB01 paragraph 1.7, bullet 2.

<sup>20</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.