



Quod

R22 Local Plan

**Matter 11:
Viability**

**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 11: Viability. 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, 7, and 10.
- 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 11: Viability

Issue: Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to viability.

Q1. How has the Council ensured that its viability evidence is up to date in line with national policy and guidance and in what ways has the evidence shaped the policy requirements of the Plan?

- 2.1 The Whole Plan Viability Assessment (WPVA) (April 2025) (EB01) represents the Council's evidence base on the deliverability of policy requirements over the plan period. Planning Practice Guidance (PPG)² advises that viability evidence must be proportionate, up-to-date and reflective of local market conditions.
- 2.2 Since publication of EB01, there have been significant national and regional shifts directly affecting development viability.
- 2.3 The Secretary of State has recently confirmed that high finance costs, regulatory constraints and construction inflation have created "a perfect storm"³, contributing to more than one-third of London boroughs recording zero housing starts in Q1 of this year.
- 2.4 In response, the GLA and MHCLG have jointly brought forward the Support for Housebuilding in London measures, published for consultation in November 2025. These recognise the exceptional conditions currently affecting housing delivery and propose policy adjustments, including a reduction of the affordable housing threshold to 20% for qualifying schemes.
- 2.5 Although paragraph 1.5 of the EB01 acknowledges wider market volatility it suggests that these might be cyclical conditions which is not the case, given that many of the new building standards impacting viability are imbedded in policy.
- 2.6 The PPG⁴ is clear that plans should not be set at the margins of viability, and viability evidence must inform and shape the policy requirements of the Local Plan, rather than be used to retrospectively justify policies once adopted. If viability considerations are applied only after these policy expectations are fixed, this naturally risks the adoption of requirements that operate at the margins of viability.
- 2.7 Without sufficient flexibility in the drafting of Local Plan policies, the cumulative cost burden of the Plan will undermine its deliverability and its core policy objective, to secure a sufficient supply of both market and affordable homes to meet local needs.

² PPG Paragraph: 013 Reference ID: 10-013-20240214

³ Housing Delivery WMS (23rd October 2025) (UIN HCWS991) by Steve Reed (Secretary of State for Housing, Communities and Local Government)

⁴ PPG (Community Infrastructure Levy) (Paragraph: 020 Reference ID: 25-020-20190901)

2.8 The adopted Plan has already fallen foul of this core objective, failing to meet minimum housing needs, and it remains unclear how the Plan is materially different, and will not oversee the same outcome.

2.9 Modifications are therefore necessary as follows: -

2.9.1 The WPVA excludes costs such as abnormal costs, CIL indexation. It isn't yet clear if all Fire Safety requirements have been considered albeit reference is made to 'second stairs'. There is no specific reference to BS9991, that was introduced in November 2024, which is estimated to reduce building efficiencies by a further 1-2%, equivalent to c.£7m on the relevant typology. The WPVA should confirm what reasonable development costs incurred at application stage are excluded.

2.9.2 The Plan should include supporting text qualifying the limitations of the WPVA (1) there may not be a precise correlation between the outputs of this study and scheme-specific viability when applications are submitted; (2) exceptional costs have been excluded⁵; (3) flexibility may be required for the tenure mix (60:40) tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing⁶ (4) it is recognised that the Viability Tested route is likely to be followed with a degree of flexibility for applications⁷; a flexible⁸ approach to policies is necessary to demonstrate deliverability⁹.

2.9.3 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 clearly reflect the outputs of the

⁵ WPVA para 4.61 and 4.62

⁶ WPVA para 1.7 bullet 2 ... *Although a number of the development scenarios tested could viably support the full strategic affordable housing policy target, our appraisals indicate that there are significant variations in the percentages of affordable housing that can be provided depending on private sales values, scheme composition and benchmark land value. The results therefore do not point to any particular level of affordable housing that most schemes can viably deliver. The Council's draft Policy H4 maintains the currently adopted strategic target of 50% (applied on a sliding scale) and takes into consideration the economics and financial viability of site-specific circumstances. Given that this reflects the Council's current practice and also the approach in the 2021 London Plan, we consider the draft Policy to be reasonable. It allows for sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing.*

⁷ WPVA para 7.11 *There may be instances when viability issues emerge on individual developments, even when the land has been purchased at an appropriate price (e.g. due to extensive decontamination requirements). In these cases, some flexibility may be required subject to submission of a robust site-specific viability assessment. This flexibility is allowed for in the draft NCLP policies and by the adoption of the Mayor of London's 'threshold' approach to affordable housing.*

⁸ WPVA para 7.7 *Our appraisal results support the proposed policies in the draft NCLP, as they can be viably provided in some circumstances, although not all. However, lack of viability in some of the various circumstances we have tested does not mean that policies should be scaled back or abandoned; merely that when those particular sites come forward, a degree of flexibility will need to be applied. This reflects current practice in the Borough and also reflects the approach taken in the London Plan, with its two routes ('fast track' and 'viability tested'). These two routes explicitly acknowledge that applying the full policy target to all sites would render some unviable and put them at risk of not coming forward; the flexibility inherent in the London Plan ensures that those schemes can still come forward, albeit with a reduced contribution to policy objectives.*

⁹ WPVA para 7.12 *This study demonstrates that Camden's proposed policies in its proposed NCLP and its flexible approach to applying its affordable housing requirements will ensure an appropriate balance between delivering affordable housing, sustainability and climate change objectives, necessary infrastructure and the need for landowners and developers to achieve a reasonable return.*

WPVA. The Plan should include supporting text used within the Newham and Tower Hamlets Local Plan (See our Hearing Statement Matter 2) ensuring that for site allocations, the policies set out in the plan should be applied flexibly to ensure that the sites are viable and deliverable.

Q2. How are the development requirements and principles set out in the Plan's policies justified, effective and aligned with national policy and the London Plan in relation to: a) Affordable housing; b) Housing mix; c) On and off site provision of services and facilities; d) Financial contributions towards infrastructure?

a) Affordable Housing

2.10 The Framework¹⁰ suggests that viability must be assessed at the plan-making stage to ensure that emerging policies are realistic and based on proportionate evidence. The total cumulative cost of all relevant policies must not undermine the deliverability of the plan¹¹. In this context, "deliverability" refers to achieving the plan's key objectives, most importantly, the delivery of sufficient housing to meet objectively assessed needs.

2.11 EB01 does not achieve this objective. At paragraph 1.7 it notes the following.

*Although a number of the development scenarios tested could viably support the full strategic affordable housing policy target, our appraisals indicate that there are significant variations in the percentages of affordable housing that can be provided depending on private sales values, scheme composition and benchmark land value. The **results therefore do not point to any particular level of affordable housing that most schemes can viably deliver.** The Council's draft Policy H4 maintains the currently adopted strategic target of 50% (applied on a sliding scale) and takes into consideration the economics and financial viability of site-specific circumstances.*

Given that this reflects the Council's current practice and also the approach in the 2021 London Plan, we consider the draft Policy to be reasonable. It allows for sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with the maximum viable package of affordable housing.

2.12 The WPVA does not support a 50% strategic affordable housing target as deliverable, and it does not appear to support a 35% target either¹² (the thresholds of the London Plan).

2.13 For Typologies 15 and 16 which are most similar to the Camden Goods Yard site the "significant variations" referred to in the WPVA do in fact show that the proposed strategic target of 50% affordable homes and Fast Track threshold of 35% affordable homes are entirely unrealistic:

¹⁰ NPPF Paragraph 59

¹¹ PPG (Viability) (Paragraph: 002 Reference ID: 10-002-20251216)

¹² EB01 Appendix 2 Base Case (5 to 13 flats to 575 homes) page 402 – 509 column 7 (Base Build Costs, Access Prt M4(2), Building Safety Levy, S106, CIL, Build Regs 2022 & Staircases, Wchair Prt M4(3), BREEAM Excellent, Biodiversity, Renewable Offset Payments, Sustainability & Embodied Carbon)

- 2.13.1 At the 50% target only 31 of the 192 scenarios tested are shown to be viable (i.e. 16% of the total) when including the proposed policy costs.
- 2.13.2 At the 35% target only 58 of the 192 scenarios tested are shown to be viable (i.e. 30% of the total) when including the proposed policy costs.
- 2.14 The Plan does not therefore identify any particular level of affordable housing that the majority of typologies can viably accommodate. Instead, it concludes that the emerging policy framework is deliverable only on the basis that schemes are able to pursue the Viability-Tested Route.
- 2.15 As EB01 has not taken into account abnormal costs (paragraph 4.61 and 4.62) these are extremely conservative conclusions. For the Newham Local Plan, evidence was submitted providing an indication of the additional costs arising from abnormals excluded from the WPVA, increasing costs by 8-15% (see **Appendix 2**).
- 2.16 EB01 does correctly recognise this 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*”¹³, and proposes use of the London Plan Viability Tested Route¹⁴, within Plan Policy H4. Plan Policy H4 correctly includes this route in principle (E and F) and this is essential to the soundness of the plan, and this flexibility must be retained, but the text should be revised to refer to the Viability Tested Route.
- 2.17 It therefore follows that the drafting of relevant Local Plan policies should refer to the actual strategic conclusions of EB01 to make clear and explain why flexibility is necessary, with explicit reference to financial viability considerations and the need to ensure that development remains deliverable over the plan period.
- 2.18 EB01¹⁵ states that setting a lower affordable housing requirement could result in fewer affordable homes overall, on the premise that some sites may otherwise have exceeded the baseline requirement. However, there is no evidence presented to substantiate this claim; and the Adopted Plan affordable threshold of 50% has presided over poor housing delivery in the borough generally and poor affordable delivery. This approach is also contrary to the Viability PPG.
- 2.19 An unrealistic and undeliverable affordable threshold increases the risk of delays or planning refusals by elected members, who may perceive a deviation from policy expectations. The Council has refused permissions because they deviate from the ‘target’ affordable %.
- 2.20 To mitigate this, policies should confirm that weight will be applied to the Threshold Approach and Viability Tested Route equally.

¹³ EB01 Paragraph 1.7

¹⁴ London Plan 2021 Policy H5(F)

¹⁵ EB01 Paragraph 1.7

Q5. What does the evidence show about the impact of the Plan’s policy requirements on the viability and deliverability of allocated sites and has this been addressed to ensure the Plan is sound?

2.21 Inspector Fieldhouse during the recent Newham Local Plan EiP proposed changes to Paragraph 4.3 of that Plan to embed flexibility into allocation policies.

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.¹⁶

2.22 The Plan should also include similar wording which recognises the limitations of the EB01, that the 50% affordable target is not deliverable in nearly all cases; excludes key considerations such as abnormal costs; and the Plan policies should be applied flexibly to ensure deliverability of the Plan as a whole including for the site allocations. The Plan should additionally recognise that the maximum reasonable amount of affordable housing delivered by the Viability Tested Route carries equal weight to the threshold approach.

2.23 Adopting equivalent wording would also align with London Plan 2021 (LP2021) Policy DF1, which requires boroughs to consider circumstances where an applicant is required to provide significant infrastructure to unlock development, beyond what would normally be expected for the scale of the scheme¹⁷.

¹⁶ Newham Local Plan – Schedule of Main Modifications (ED020B)

¹⁷ Supporting Paragraph 11.1.4 of LP2021 Policy DF1

3 Appendix 1: Summary and Overview

- 3.1 Our concerns regarding soundness and effectiveness¹⁸ 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 2004¹⁹.
- 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 Method²⁰ of housing need, required by the Framework²¹; 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 Framework²².
- 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 Framework²³, even with a reduced housing requirement. In December 2025 the Council agreed²⁴ that its

¹⁸ Framework (February 2025), paragraph 16 & 36

¹⁹ Cherkley Campaign Ltd v Mole Valley DC [2014] EWCA Civ 567 (Court of Appeal)

²⁰ 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."*

²¹ Framework (February 2025), paragraph 62

²² Framework (February 2025), paragraph 33

²³ Framework (February 2025), paragraph 72

²⁴ 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 deliverable²⁵.

- 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 failed²⁶. It benchmarks housing delivery up to 2028/29 against the London Plan²⁷, but this plan is out of date as of 2nd March 2026, being 5 years since adoption without review²⁸, 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 costs²⁹. 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*"³⁰. It proposes use of the London Plan Viability Tested Route³¹ 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

²⁵ Framework (February 2025), paragraph 72 (a) and glossary

²⁶ 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'.

²⁷ 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)*'.

²⁸ Framework (February 2025), paragraph 34 and 78

²⁹ EB01 paragraph 4.61 and 4.62

³⁰ EB01 paragraph 1.7, bullet 2.

³¹ 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.

4 Appendix 2 – Abnormal Costs

Table 1 – LB Newham Sites - Abnormal Cost Evidence

Site (Application Ref)	Decision Date	Verified Costs Without Abnormals	Verified Costs with Abnormals	Increase
Royal Wharf (Ref 24/02083/OUT)	Awaiting Decision	£577,863,574	£626,797,142	£48,933,568 +8.5%
Silvertown Quays (22/02855/OUT)	Awaiting Decision (Committee on 11/11/2025)	£2,591,413,115	£2,987,357,615	£395,944,500 +15.3%
Bromley-by-Bow Gasworks (Ref 23/02033/OUT)	28/02/2025 (Approved)	£814,111,972	£914,502,315	£100,390,343 +12.3%
Beckton Riverside (Ref 24/00989/OUT)	23/10/2025 (Approved)	£864,345,956	£934,503,956	£70,158,000 +8.2%