

Examination of the London Borough of Camden Local Plan**Inspector:** K Ford**Programme Officer:** Pauline Butcher**Telephone:** 07593 967301**Email:** CamdenLPP02025@outlook.com**Website:** <https://www.camden.gov.uk/examination>

Date 12 August 2026

Dear Ms Burden

Examination of London Borough of Camden Local Plan (the Plan)

1. Further to my letter of 18 June 2026, and following the Council's completion of the actions arising from the hearing sessions held in May and June 2026 (available in the Examination Library ED97 to ED101), I am writing to set out the next steps in the Examination.
2. Based on the evidence presented to me to date I am of the view that, while the Plan as submitted is unsound, it is likely to be capable of being made sound through the incorporation of Main Modifications (MM).
3. A number of outstanding matters must be addressed before I can agree the MMs that are necessary for soundness/legal compliance and the Plan can proceed to consultation on the proposed MMs. I am grateful to the Council for its continued work in this regard. At my request, a schedule of potential MMs was prepared following the hearing sessions reflecting matters identified during the examination. This schedule should now be finalised to reflect the further work undertaken since my first post-hearings letter and to take account of the points set out in this letter, liaising with me via the Programme Officer as necessary.
4. The remainder of this letter sets out my preliminary conclusions on the additional housing land supply work undertaken by the Council since my first post-hearings letter. These conclusions will inform the MMs that I consider necessary to address the identified soundness issues and make the Plan sound. Insofar as it is necessary to do so, my final report will provide fuller reasoning on these matters and will take account of any representations received during the consultation on the proposed MMs.

Housing Land Supply

5. I have considered the Council's response to my post hearings letter, including the updated housing trajectory and supporting evidence contained within ED100. The work undertaken, including engagement with landowners, site promoters and relevant Council officers, provides a thorough review of the anticipated housing supply, and I am satisfied that it is reasonable and proportionate to the Plan currently under examination. For present purposes it represents a robust and up to date assessment.
6. The updated trajectory indicates that 4,714.3 dwellings are expected to be delivered within the first 5 years of the Plan period against a target of at least 8,349.6 dwellings. This equates to a 2.8 year housing supply once the backlog and buffer are applied and reflects the particular circumstances of the Borough.
7. Whilst I acknowledge that the Plan is forecast to meet its housing requirement over the Plan period, it would nevertheless be adopted without a 5 year supply of deliverable housing sites. The shortfall is substantial and I am concerned about the effectiveness of the Plan and the extent to which it can support the delivery of identified housing needs in the early years of the plan period.
8. I have considered whether this matter should be addressed through the identification of additional allocations or a more fundamental reconsideration of the Plan's spatial strategy through the current examination. However, based on the evidence before me, I am not persuaded that such an approach would represent a proportionate or effective response in this specific context. For present examination purposes, the evidence shows that all reasonable opportunities for further housing delivery have been explored and no compelling evidence has been presented during the examination to demonstrate a materially greater deliverable housing supply within the Borough.
9. Delaying adoption to undertake a more fundamental review of the housing strategy would risk postponing the delivery of the wider benefits of the Plan, would not adequately acknowledge plan making activity likely to result as a consequence of a new London Plan, and would be inconsistent with the Government's aims of getting up to date plans in place. In the particular circumstances of this case, I consider that a pragmatic approach is justified.
10. Nevertheless, the inability to demonstrate a 5 year housing land supply on adoption remains a soundness concern. Given the absence of evidence that a materially greater deliverable housing supply could be secured through further modifications at this stage, the scale of the shortfall is such that the Plan should include a mechanism to ensure that the housing strategy is reconsidered promptly should circumstances change. This includes responding effectively to any changes in the strategic planning framework arising from the new London Plan, which may include revised approaches to density, optimisation of site capacity, tall buildings or other measures capable of supporting housing delivery. In these circumstances it is important that the Council reassesses

whether the assumptions underpinning the Plan's housing strategy remain appropriate and reflect the most up to date policy context.

11. Accordingly, the Council should prepare a Main Modification introducing a policy requiring commencement of a new-style Local Plan within the new legislative framework triggered by either the adoption of a reviewed or new London Plan or 5 years from adoption of the Local Plan, whichever occurs sooner.
12. The review should include a reassessment of the Borough's housing requirement, housing land supply position, housing delivery assumptions and the effectiveness of the Plan strategy in meeting identified housing needs, having regard to the prevailing national policy and any changes arising from a reviewed London Plan.
13. The Council should provide proposed policy wording and supporting text for me to consider further. The review mechanism should be contained within policy rather than solely within supporting text or monitoring provisions to provide a clear and effective commitment within the development plan. Subject to the inclusion of such a review, for present purposes I am satisfied that the Plan is capable of being found sound.

Next Steps

14. The detailed reasons for all recommended MMs will be set out in my final report to the Council following a period of formal consultation. The timetable for consultation should be agreed with me through the Programme Officer in due course.
15. Before consultation can commence, I will need to review the final draft schedule of MMs to ensure that it comprehensively addresses all identified soundness issues. To assist the Council, I will also need to review the Schedule of Additional Modifications (AMs), although such modifications formally fall outside the scope of the examination provided they can properly be regarded as AMs.
16. The Council will also need to consider whether any updates to the Sustainability Appraisal (SA) and/ or Habitats Regulations Assessment (HRA) are required as a consequence of the proposed MMs.
17. Once the SA/HRA updates have been completed, the Council should make the necessary arrangements to undertake consultation on the proposed MMs for a minimum period of 6 weeks with dates to be agreed with me through the Programme Officer. Any updates to the SA and/or HRA should also be subject to consultation alongside the proposed MMs.
18. Once the consultation is launched representations are invited only on the proposed MMs and any amendments to the SA and/ or HRA. I will not consider representations on AMs. Such modifications are a matter for the Council. Any

consultation on the AMs should be kept separate from consultation on the MMs.

19. The consultation should be undertaken with all statutory consultees and other interested parties. It should not be limited to those who made representations at the Regulation 19 stage.
20. Following consideration of the consultation responses, I will reach my final conclusions on the MMs required to make the Plan sound. The expectation is that representations received during consultation on the MMs will be considered through the written representation process. Further hearing sessions will be arranged only in exceptional circumstances.
21. I am not inviting any comments on the contents of this letter as interested parties will have the opportunity to make representations during the formal consultation on the proposed MMs. Should the Council have any questions, please contact me through the Programme Officer.

K Ford

INSPECTOR