

Rebecca Burden
Development Plans Manager
Planning Policy
London Borough of Camden
Town Hall
Judd Street
London WC1H 9JE

Ref: LDF002436

Date: 18 June 2026

Dear Ms Burden,

Examination of the Camden Local Plan (the Local Plan)

I am grateful to the Council for the further work that has been undertaken on the Plan and evidence base at my request before, during and after the Hearing sessions. That work is available to view in Examination documents listed on the Examination website¹.

As indicated at the close of the Hearings on 11 June 2026, I am now writing to you regarding outstanding matters discussed at the Hearings. My comments are based on all that I have read, heard and seen to date. However, as the Examination is not yet concluded the comments set out in this letter are without prejudice to my final conclusions on the Local Plan and subject to satisfactory completion of the further work set out in this letter.

Housing Land Supply

Paragraph 72 of the National Planning Policy Framework (NPPF) requires that planning policies should identify a supply of specific, deliverable sites for years 1-5 following the intended date of adoption, with an appropriate buffer. Specific, developable sites or broad locations for growth should be identified for years 6-10 and, where possible years 11-15.

The housing trajectory (SD14) indicates that 4733 housing completions can be delivered in the 5 year period 2026-2031 against a target of at least 8350 dwellings. The Council's evidence of 2.8 years of supply falls markedly short of the 5 year requirement once past shortfall and the necessary buffer are properly accounted for. This position appears to be inconsistent with national policy and so consequently raises soundness concerns.

¹ <https://www.camden.gov.uk/examination-documents>

In this context it is necessary to ensure that the housing trajectory is as robust, comprehensive and up to date as possible.

To this end the Council should undertake a full review of the housing trajectory. This should:

- Reassess all sites currently included in the trajectory (particularly those in years 6-10), ensuring assumptions regarding delivery (including lead in times, build out rates, phasing) are based on the best available, proportionate, and most up to date evidence and consider whether, on the basis of the reassessment, any could be brought forward into the 5 year supply.
- Provide updated evidence where necessary to support any revisions, including engagement with developers, landowners and relevant stakeholders.
- Set out any implications arising from the revised trajectory for overall housing delivery and plan soundness.

In doing this work the Council should provide:

- An updated housing trajectory and accompanying trajectory graph.
- A schedule of sites included with clear explanation of any changes.
- Updated assumptions and evidence supporting delivery rates.
- A brief explanatory note summarising the review undertaken and its conclusions.

Euston Area

The Local Plan is justified in recognising the importance of the Euston Area and the potential for development including housing. It is anticipated the housing will come forward as part of the Euston Area Plan in due course. The Local Plan and the Council's housing trajectory identify 875 dwellings being completed in the Euston Area over the plan period which would be a notable contribution to the overall housing supply.

The housing trajectory anticipates completions in the Euston Area in 2031/32 and then from 2035/36 onwards. As the trajectory relies on the Euston Area to contribute to the overall housing supply, I need to be satisfied that there is a reasonable prospect of delivery within the timescale and at the scale envisaged. However, there is insufficient evidence to demonstrate that the anticipated scale and rate of delivery is realistic, as the available information lacks the necessary clarity and detail.

The Council should provide further evidence that includes:

- A clearer identification of each of the sites in the Euston Area (including boundaries).
- Land ownership, developer interest and proposed phasing.
- Lead-in times, including assumptions on preparation, applications and likely start dates.

- The basis for the projected annual completion rates.
- Key constraints and whether they can be addressed within the proposed timeframe.
- Whether any further applicable policy requirements are needed to be specified in the Local Plan and, if they are not, a justification for how delivery would happen as expected in the absence of specific policy requirement.

Maximising Housing Land Supply

Lowering the number of homes on sites

Paragraph 1.40 of the Local Plan allows a lower number of homes to be supported where this can be justified having regard to the overall housing supply and demonstrable needs for other land uses. I note that the Local Plan seeks to maximise the delivery of permanent self-contained homes across the borough, an objective reflected in both Policy H1 and Policy H2. I also note the Council's position that at present a 5 year housing land supply cannot be demonstrated. In this context, the flexibility provided by the final sentence of paragraph 1.40 could, if applied without sufficient control, lead to a reduction in housing numbers on allocated sites, which may undermine the Local Plan's objective of maximising housing delivery.

That said, I recognise that paragraph 1.40 is intended to support a design-led and proportionate approach, allowing site-specific circumstances, including viability, heritage considerations, and the need for other land uses, to be taken into account. This is consistent with national policy requiring plans to be deliverable and responsive to local context.

Nevertheless, for effectiveness and consistency with the Local Plan's objective to maximise housing delivery, I consider that the wording should be refined to make clear that a reduced level of housing provision would only be appropriate where there is clear and robust justification. The Council should prepare a draft Main Modification to address this matter for me to consider further.

Reasonable prospect of housing delivery

Paragraphs 7.25, 7.29, 7.284 and 7.331 of the Local Plan ask applicants to demonstrate that there is no reasonable prospect of delivering permanent self-contained housing within the Plan period before alternative forms of housing would be supported.

As currently drafted, the wording could be interpreted as requiring demonstration that development for permanent self-contained housing would not be deliverable at any point over the 15-year Plan period. When applied in practice, I am concerned that this may represent a relatively high evidential threshold for applicants that may unjustifiably impact on the delivery of housing.

I recognise that the intention of the policy is to prioritise the delivery of permanent self-contained housing, consistent with the Local Plan's overall strategy and Policy

H1, and to ensure that alternative forms of development do not prejudice housing supply.

However, the requirement to demonstrate a lack of reasonable prospect of delivery across the entire Plan period introduces a degree of rigidity that may be inconsistent with the need for plans to be effective and deliverable. In practice, viability, site constraints and market conditions are subject to change, and it would not be proportionate to require certainty over such a long timeframe.

For effectiveness and clarity, I consider that the wording relating to deliverability should be modified to ensure that it does not imply a requirement to demonstrate that housing is not deliverable at any point over the full Plan period but instead allows for a proportionate assessment based on realistic delivery prospects. This would retain the Local Plan's clear priority for housing delivery, while ensuring that the policies are sufficiently flexible, justified and effective in application. The Council should prepare a draft Main Modification to address this matter for me to consider further.

Imprecise Wording

I am concerned that the Council's use of the phrase "to the Council's satisfaction" throughout the Local Plan and supporting text is imprecise and does not provide a clear or effective basis for decision making. Where needed, the Council should replace this wording with criteria that are specific, measurable and unambiguous. Any requirements should be framed so that compliance can be robustly evidenced, and where necessary, justified against clear and transparent standards. This would ensure that policies are effective, consistent with national policy expectations for clarity, and capable of being properly applied in practice. The Council should prepare a draft Main Modification to address this matter for me to consider further.

Monitoring

The monitoring indicators set out in SD15 provide a structured basis for assessing the performance of the Local Plan across its thematic chapters. The inclusion of a range of indicators covering housing delivery, climate change, the economy, environmental quality and infrastructure is a sound general approach, as is the identification of data sources and the link to reporting through the Authority Monitoring Report.

However, while the indicators themselves are generally clear and measurable, to be sound the document should include additional detail to constitute an effective monitoring framework.

In particular:

- There is an absence of contextual indicators to measure policy performance against wider trends, making it difficult to identify patterns or contextual changes.
- The framework would be strengthened by the inclusion of targets or benchmarks against which performance can be assessed, to enable a clearer understanding of whether policies are being successfully implemented.
- There is limited information on trigger points or contingency measures, setting out how the Council would respond where monitoring identifies underperformance. Including such mechanisms would help demonstrate how the Local Plan will remain effective over time.
- Greater clarity on the frequency of monitoring and any baseline positions would also assist in ensuring that trends can be robustly assessed.

The Council should therefore review the structure, scope, and content of the submitted Monitoring Framework. In doing so, it may be helpful to draw on best practice, including guidance published by the Planning Advisory Service in “Monitoring that matters towards a better AMR².” For reference, have included a template that the Council may wish to consider using in Appendix A.

Early Review Policy

As a consequence of the positions relating to the emerging London Plan and the housing land position in the Local Plan, I will consider further the question of whether review of the Local Plan should be mandated once I have the Council’s response to the points raised in this letter.

Next Steps

I would be grateful if you can confirm the Council’s timing for undertaking the work identified and provide me with a realistic timescale for it to be completed.

This letter should be published on the Examination website. However, I am not inviting, nor do I intend to accept, comments on its content as any Main Modifications I conclude are necessary for soundness will be subject to consultation in due course.

Please let me know via the Programme Officer if you have any queries regarding the above. I look forward to your response.

K Ford

INSPECTOR

² <https://www.local.gov.uk/sites/default/files/documents/monitoring-matters-toward-6c1.pdf>

Appendix A

Strategic Objective	Policy	Policy Purpose	Contextual Indicators	Policy Indicators	Policy Targets	Triggers for Action	Actions to inform need for policy review
Meeting Housing needs of Borough	Policy Ref	Meeting housing needs	Gross number of dwellings in Borough at Local Plan base date	<p>Met additional homes completed within monitoring year</p> <p>Annual and cumulative net additional housing units granted planning permission but not yet commenced</p> <p>Annual and cumulative net additional units granted planning permission and under construction but not yet completed</p>	Completion of a minimum of x net additional housing units per year	Completion rate for monitoring period falls below x net additional dwellings annualised target and cumulative Local Plan trajectory forecast	Prepare action plan where Housing Delivery Tet targets not met