# Statement of Common Ground between the London Borough of Camden and City of Westminster

May 2025





#### Introduction

- 1. This document is the Statement of Common Ground (SoCG) between the London Borough of Camden and the City of Westminster.
- 2. It has been prepared to demonstrate that Camden's Local Plan Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' in accordance with Paragraph 36 of the National Planning Framework (NPPF) throughout the plan preparation period and will inform further engagement to ensure effective implementation of Local Plan policies.
- 3. It focuses on areas of agreement, any areas of disagreement and ongoing discussions between London Borough of Camden and the City of Westminster on strategic cross boundary matters.
- 4. In the spirit of collaboration, the document has been prepared as a 'live' document, that can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating. This should be read in conjunction with the Statement of Common Ground between Camden and Westminster prepared for the Westminster Local Plan, which was signed April 2024.
- 5. The London Borough of Camden is reviewing its Local Plan 2017 and Site Allocations 2013. Camden published a Draft Site Allocations Local Plan for consultation in February - April 2020, with further consultation on the Plan undertaken in December 2021 - January 2022. It was then decided to incorporate the Site Allocations into the draft Local Plan, rather than take it forward as a separate document. Following a call for views consultation in November 2022 -January 2023, consultation on a draft new Local Plan took place in January -March 2024.
- 6. In response to the previous engagement rounds and updated evidence, revisions have been made to the Local Plan. Camden are undertaking consultation on the Camden Local Plan Proposed Submission Draft (Regulation 19) from Apil to June 2025, with submission to the Planning Inspectorate expected in the Autumn 2025.
- 7. The Westminster City Plan 2019 2040 was adopted in April 2021. Following a change in political administration, a partial review of the City Plan to revise the affordable housing policy, introduce a new retrofit first policy, and the proposed inclusion of some site allocations was instigated. Examination hearings on the Partial Review concluded in early May 2025. Upon adoption of the Partial Review, the council will embark of a Full Review.

#### Strategic Geography

 The SoCG covers the Local Planning Authority areas of the London Borough of Camden and the City of Westminster. The boundaries of these areas are shown on Figure 1.

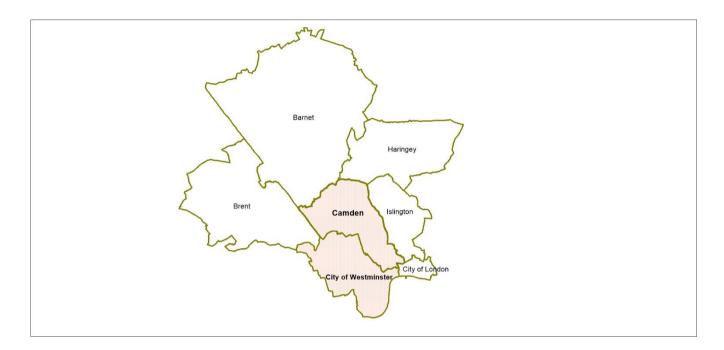


Figure 1: Boundaries of the London Boroughs of Camden and the City of Westminster

#### **London Borough of Camden**

9. Camden is a diverse inner London Borough with a population of approximately 215,000. Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End and City of London. Further north the character changes with many residential areas and neighbourhoods, including Camden Town, Hampstead, Highgate, Swiss Cottage, West Hampstead and Kentish Town, each with their own distinctive identity and characteristics. The character of the borough is also shaped by its topography and by significant parks and open spaces including Hampstead Heath and Primrose Hill

#### **City of Westminster**

10. The City of Westminster stretches over just eight square miles and is one of central London's largest boroughs. Much of Westminster is within the Central Activities Zone (CAZ). Westminster is home to over 211,000 people, 56 conservation areas covering 78% of the City's footprint and 789,000 jobs. Professional, business and financial industries make up the largest employment

sector, however, Westminster is a global hub for creative industries with 30% of all London's jobs in music, performing arts and visual arts based within the City. Westminster is home to more than 130 major cultural establishments such as Tate Britain and the National Gallery.

# **Key strategic matters**

- 11. Many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan or addressed through the preparation of the London Plan. The London Plan is part of the development plan for all planning authorities in London and Local Plans prepared by London boroughs are required to be in general conformity with it.
- 12. Officers from both authorities have an ongoing and close relationship with Greater London Authority (GLA) officers, attend regular meetings to discuss strategic matters affecting our areas and London as a whole, and have participated in the development and review of the London Plan.
- 13. Camden and the City of Westminster have had ongoing dialogue on cross-boundary planning issues for many years, discussing a broad range of planning issues including strategic matters. Meetings were held on 30 June 2017, 16 May and 18 December 2018, 17 March 2021, 11 September 2023 and 20 June 2024. These discussions have informed development of emerging and adopted plans and other related documents (see Appendix 1.)
- 14. The issues set out below are considered to be the key strategic matters with regard to ongoing plan-making relevant to the London Borough of Camden and the City of Westminster, although it is noted that there are other issues that may have cross-boundary impacts. Camden and Westminster are committed to further dialogue, not just limited to periods of plan preparation.

#### Housing

- 15. The London Plan sets a housing target for Camden of 10,380 additional homes from 2018/19 to 2028/29, which equates to a need to deliver a minimum of 1,038 homes per year. This includes 3,280 homes from small sites.
- 16. The Camden Local Plan Proposed Submission Draft aims to deliver a minimum of 11,550 additional homes (770 homes per year) over the plan period to 2041. This target has been derived in accordance with the guidance in the London Plan and includes the final three years of Camden's targets for 2019/20 to 2028/29 from the London Plan, and the anticipated backlog against this target at the start of the Local Plan period. It is a capacity-based figure, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery). It also reflects the uncertainty and delay in development at Euston. In calculating the housing requirement for the Plan period, Camden has taken into account the housing

- capacity figures for large sites as set out in the Greater London Authority's Strategic Housing Land Availability Assessment (SHLAA) 2017, together with the small sites target set by the London Plan.
- 17. It should however be noted that the review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted will supersede the target that is in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027, so this would mean that Camden's new Local Plan housing target is only in place for a short period of time.
- 18. The adopted Westminster City Plan aims to deliver over 20,685 homes in the plan period. The partial review includes updating the affordable housing policy to seek to secure more affordable homes and prioritise social housing.
- 19. Both authorities recognise that the London Plan (2021) is due to be replaced shortly after the anticipated adoption of their Local Plans, and that this will set a new overall housing target for London, and provide updated housing targets for individual London boroughs. The Greater London Authority have launched the LAND4LDN programme to provide real time data for London boroughs to use in the updated SHLAA process going forward. Both boroughs will continue to work collaboratively with the GLA on this project.
- 20. The National Planning Policy Framework requires local planning authorities to demonstrate a five year supply of deliverable housing sites plus a five percent buffer. Camden cannot currently demonstrate a five year housing land supply, but continue to work on meeting this target. Camden will therefore be writing to Westminster and other boroughs under the Duty to cooperate in relation to this matter.

#### Gypsy and traveller accommodation

- 21. The Westminster City Plan 2019 2040 identifies that there is no need for residential pitches for gypsies and travellers in Westminster.
- 22. Camden's adopted Local Plan identifies a need for 16 additional traveller pitches to 2031, based on a 2014 assessment of need.
- 23. The London Plan 2021 indicates that boroughs should update their gypsy and traveller accommodation needs assessments as part of the Local Plan review process. To inform the review of the London Plan, the GLA are carrying out a London-wide Gypsy and Traveller Accommodation Needs Assessment. The provisional findings of the emerging Gypsy and Traveller Accommodation Needs Assessment identify a need for 11 additional pitches in Camden by 2031/32. The overall need for the period covered by the new Local Plan (to 2041) will however be higher and is estimated to be 19 additional pitches. This review has provisionally also identified a need in Westminster for 6 pitches.

- 24. As part of the preparation for the new Camden Local Plan, calls for sites suitable for Gypsy and Traveller accommodation were undertaken in 2020, 2021/22 and winter 2022/23.
- 25. In 2023 the London Borough Camden commissioned consultants to undertake a Gypsy and Traveller Site Identification Study to identify council-owned sites that could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.
- 26. The study identified 18 parcels of land that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council. Further assessment work undertaken by officers ruled out 16 of these parcels of land on the basis that they are either unsuitable or unavailable. The two remaining parcels of land have been allocated in the Camden Local Plan Proposed Submission Draft to help meet the accommodation needs of Gypsies and Travellers in Camden. It is anticipated that these sites could deliver a maximum of six pitches. This will go some way to meeting the identified need for Gypsy and Traveller accommodation in Camden, however it will not meet the identified need in full.
- 27. Camden will therefore be writing to City of Westminster and other boroughs under the Duty to Co-operate in relation to this matter.

# **Knowledge Quarter / CAZ**

- 28. The continued success of the Central Activities Zone (CAZ) is vital to London's world city status. The London Plan and local plans prepared by Westminster and Camden seek an increase in office floorspace across the CAZ to sustain London's economic competitiveness. Both authorities have introduced Article 4 Directions to protect central London's strategically important office supply against conversion to residential use under permitted development rights.
- 29. The Camden Local Plan Proposed Submission Draft also supports the Knowledge Quarter District, and the provision of new employment floorspace (including laboratory or lab-enabled floorspace) in the area centred around King's Cross and Euston. The Knowledge Quarter is an internationally significant innovation district, harnessing collaboration between private sector companies, arch establishments. The Camden Local Plan Submission Draft supports the provision of employment floorspace in the area that meets the needs of the thriving knowledge economy and CAZ functions in the south of the borough and includes site allocations to help deliver this

#### **Tottenham Court Road Opportunity Area**

30. Both Councils recognise the Opportunity Area identified in the London Plan. Most of the development envisaged in this area has been completed.

#### Tall buildings

- 31. The Camden Local Plan Proposed Submission Draft identifies three sites where a tall building may be appropriate close to the boundary with Westminster. These are Central Cross, 18-30 Tottenham Court Road, which falls within Tottenham Court Road Opportunity Area where intensification is supported by the London Plan, Selkirk House (site allocation S17), and 110 High Holborn. Applications for tall buildings on sites identified in the draft Local Plan as locations where tall buildings may be an appropriate form of development are considered against relevant criteria, including consideration of the relationship between any proposed tall building and neighbouring boroughs, and any impact on the historic environment.
- 32. The Westminster City Plan and Camden's Submission Draft Plan both have a policy on Tall Buildings.

#### **Euston Area**

33. The Camden Local Plan Proposed Submission Draft contains a Euston Area policy, setting the overall objectives for the area. The Council is also preparing an update to the Euston Area Plan (2013). Consultation on a Regulation 18 version of the Euston Area Plan took place in December 2023 and September 2024, and the Regulation 19 version of the Plan is currently being prepared. A separate Statement of Common Ground relating to the Euston Area Plan will be prepared at the relevant time.

#### Infrastructure

- 34. Camden intend to publish an Infrastructure Delivery Plan (IDP) alongside the Submission Draft Local Plan (Reg 19 stage) to identify the infrastructure needed to support the future growth anticipated in the Plan.
- 35. Westminster published an Infrastructure Delivery Plan in May 2021 to support their future growth. A draft update to this was consulted on from November 2024 January 2025 and is currently in the process of being finalised.

#### **Governance arrangements**

- 36. This Statement has been informed by ongoing engagement between Camden and the City of Westminster (as set out in Appendix 1). It has been prepared as a 'living' document, which will be reviewed and updated at key stages in the planmaking processes of either authority and will form a key part of implementation of Local Plan policies and any future Local Plan reviews (for both authorities).
- 37. Specific officer-level meetings to discuss cross-boundary issues will continue to be held on a regular basis, together with attendance at sub-regional or London wide group and partnership meetings where cross boundary issues are discussed.

38. Officers in each local authority will feed back to senior officers any relevant issues raised in discussions. Likewise, any senior level discussions on relevant cross-boundary issues will inform discussions on strategic planning matters.

# Timetable for review and ongoing cooperation

39. The following table details the proposed timetable for key stages in Local Plan reviews, which will inform timings of future discussions. At these key stages, this Statement will be considered and updated, if necessary.

Table 1 – Local Plan proposed timescales

Borough	Current Local Plan adoption date	Local Plan Review - Reg 18 date	Local Plan Review – Reg 19 date	Local Plan Review – Anticipated submission date
London Borough of Camden	Local Plan - July 2017	Draft Site Allocations Plan – Feb 2020  Draft Site Allocations Plan - Dec 2021  Local Plan review calls for views - Nov 2022  Draft Local Plan (incorporating site allocations - January 2024	April 2025	September 2025
City of Westminster	City Plan 2019 – 2014 adopted April 2021.	City Plan Partial review October 2022  City Plan Full Review – Spring 2026	City Plan partial review March – May 2024  City Plan Full Review – Spring 2027	City Plan partial review 28 November 2024 City Plan Full Review – Winter 2027/28

#### Signatures

40. Both parties agree that this Statement is an accurate representation of matters discussed, and issues agreed upon. We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between the London Borough of Camden and City of Westminster The authorities will continue to work collaboratively to address cross-boundary issues and to meet the duty to cooperate.

# LONDON BOROUGH OF CAMDEN

Name: Rebecca Burden

Position: Development Plan Manager

Signature: R. Burden

**Date:** 07/05/25

### CITY OF WESTMINSTER

Name: Debbie Jackson

Position: Executive Director for Regeneration, Economy & Skills (REP)

Signature:

Date: 09/05/2025

# Appendix 1 – Liaison meetings between the Camden and the City of Westminster

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Date	Title/Purpose	Key actions			
30 June 2017	London Borough of Camden and Westminster DtC meeting	Discussed progress of Local Plans.			
16 May 2018	London Borough of Camden, Brent and Westminster DtC meeting	Discussed issues relevant to all boroughs.			
13 December 2018	London Borough of Camden and Westminster DtC meeting	Discussed issues relevant to both boroughs.			
17 March 2021	London Borough of Camden and Westminster DtC meeting	Discussed issues relevant to both boroughs.			
11 September 2023	London Borough of Camden and Westminster DtC meeting	Discussed issues relevant to both boroughs.			
20 June 2024	London Borough of Camden and Westminster DtC meeting	Discussed progress of Local Plans and SoCG			