

**Date:** 12 December 2025  
**Our reference:** ED03  
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Via email

Dear Ms Ford

Thank you for your letter dated 3 November 2025 which set out your initial questions and requests for further information on specific topic areas. The Council's response to the matters raised is set out below, following the relevant text from your letter, which we have included for ease of reference.

### **Strategic Issues**

**Please confirm that the strategic issues are the ones that are listed in column one of the table in section 4 of the Duty to Cooperate Statement (SD17). (paragraph 7)**

Section 33A (4) of the Planning and Compulsory Purchase Act 2004 defines a strategic matter as –

“sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.”

As London has a spatial development strategy, the majority of strategic matters that would have a significant impact on at least two planning areas are considered at a London-wide level through the London Plan, with the local element of these matters considered through borough local plans.

The Council, along with other London boroughs and key stakeholders, engaged with the GLA as part of 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.

The table in section 4 of the Duty to Cooperate Statement (SD17) sets out strategic issues that were considered as part of the preparation of the Camden Local Plan Proposed Submission Draft. As set out below, for most of the matters listed, strategic planning has taken place at the London-wide level through the London

Plan, and the Local Plan therefore considers the non-strategic aspects for these topics (which do not have a significant impact on at least two planning areas).

- Meeting housing needs - Policy H1 of the London Plan sets ten year housing targets for each London borough covering the period from 2019/20 to 2028/29. This is considered to be “*a strategic matter*” to be addressed through the Local Plan.
- Accommodation for Gypsies and Travellers - Policy H14 of the London Plan sets out the approach boroughs should take when planning for Gypsies and Travellers accommodation needs and identifies the number of additional pitches for Gypsies and Travellers needed in each London borough from 2007 to 2017. This is considered to be “*a strategic matter*” to be addressed through the Local Plan.
- Affordable housing - Policy H4 of the London Plan sets out the Mayor’s approach to delivering affordable housing and includes a strategic target for 50% of all new homes delivered across London to be genuinely affordable. This is not considered to be a strategic matter for the Local Plan.
- Euston Opportunity Area - Policy SD1 of the London Plan identifies Euston as an opportunity area and sets out the indicative capacity for new homes and jobs to be delivered there. This is not considered to be a strategic matter for the Local Plan.
- Tall buildings / strategic views - Policy D9 of the London Plan sets out the approach that boroughs should take when planning for tall buildings and how strategic views should be considered. This is considered to be “*a strategic matter*” to be addressed through the Local Plan.
- Heritage - Policy HC1 of the London Plan sets out the Mayor’s overarching approach to heritage conservation and growth. This is not considered to be a strategic matter for the Local Plan.
- Waste - Policy SI8 of the London Plan sets out borough-level apportionments of London’s household, commercial and industrial waste. This is considered to be “*a strategic matter*” and is addressed through the North London Waste Plan, which was prepared jointly by Camden, Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest, and adopted in 2022. It is therefore not a strategic matter for the Local Plan.
- Transport - Policy T1 of the London Plan sets out the Mayor’s strategic approach to transport and the Mayor’s Transport Strategy provides further detail on how this should be delivered. This is not considered to be a strategic matter for the Local Plan.
- Water and flood risk - Policy SI 12 of the London Plan sets out the Mayor’s approach to flood risk management. In London, the boroughs are Lead Local Flood Authorities (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a flood risk management assets register. The borough’s also produce Local Flood Risk Management Strategies and are responsible for cooperating on strategic and cross-boundary issues. This is not considered to be a strategic matter for the Local Plan.
- Climate change - Policy GG6 of the London Plan sets out the Mayor’s approach to increasing efficiency and resilience to support London in becoming a zero-carbon city by 2050; and ensure buildings and infrastructure are designed to

adapt to a changing climate. This is not considered to be a strategic matter for the Local Plan.

- Natural environment - Policy G1 sets out the Mayor's approach to green infrastructure and Policy G6 sets out the Mayor's approach to biodiversity. This is not considered to be a strategic matter for the Local Plan.
- Health and well-being - Policy GG3 sets out the Mayor's approach to improving Londoners' health and reducing health inequalities. This is supported by the Mayor's Inequalities Strategy and the Mayor's Healthy Streets Approach. This is not considered to be a strategic matter for the Local Plan.
- Economy / employment - Chapter 6 of the London Plan sets out the Mayor's approach to the economy, including offices, affordable workspace and industrial land. This is not considered to be a strategic matter for the Local Plan.

The only major infrastructure project planned in Camden at present is the delivery of High Speed 2 and a new station at Euston. This is covered by the Council's Euston Area Plan, which is currently being updated separately to the Local Plan.

The Local Plan does not allocate any sites that cross the borough boundary. "*Strategic matters*" that remain to be dealt with through the preparation of the Camden Local Plan are therefore considered to be:

- Meeting housing need
- Gypsy and Traveller accommodation
- Tall Buildings.

## **Statements of Common Ground**

**I note that the Council has produced SoCG with neighbouring Local Planning Authorities. In relation to these documents please set out the following:**

- a. How specific regard has been paid to the Planning Practice Guidance in terms of the scope, preparation and publication of each SoCG.**
- b. The reasons for any shortfalls in the evidence or omissions in terms of following the guidance and any steps the Council proposes to take to address this. (paragraph 9)**

The Council has paid specific regard to Planning Practice Guidance (PPG) on Plan-making in relation to the scope, preparation and publication of each Statement of Common Ground, as a material consideration in the plan making process.

Paragraph 11 of the PPG sets out what a Statement of Common Ground is expected to contain. This includes:

- a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s)
- the key strategic matters being addressed by the statement
- the plan-making authorities responsible for joint working detailed in the statement
- governance arrangements

- the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement
- distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area
- a record of where agreements have (or have not) been reached on key strategic matters
- any additional strategic matters to be addressed by the statement which have not already been addressed

The Council considers that the Statements of Common Ground prepared with neighbouring authorities are consistent with the PPG. Previous iterations have informed, and been accepted at, the Local Plan examinations of neighbouring boroughs.

We do not consider that there are any shortfalls in the evidence or omissions in terms of following the guidance in the PPG. However, for the avoidance of any doubt, the Council has produced an addendum to each of the Statements of Common Ground prepared with neighbouring authorities, signed by both parties, to clarify:

- the strategic matters addressed by the statement;
- that both boroughs have engaged in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan, providing an opportunity for strategic matters to be discussed, and concerns in relation to the Plan to be addressed. To provide evidence of this, the addendums to the Statements of Common Ground agreed with neighbouring authorities contain the agendas and meeting notes of the duty to cooperate meetings held between the boroughs; and
- that both boroughs are satisfied that the Duty to Co-operate has been met in relation to the preparation of the Camden Local Plan and there are no unresolved matters between them.

The addendums to the Statements of Common Ground agreed with neighbouring authorities are attached as appendices to this letter:

- Appendix A – Addendum to the Statement of Common Ground with the LB Barnet
- Appendix B - Addendum to the Statement of Common Ground with the LB Brent
- Appendix C - Addendum to the Statement of Common Ground with the City of London
- Appendix D - Addendum to the Statement of Common Ground with the LB Haringey
- Appendix E - Addendum to the Statement of Common Ground with the LB Islington
- Appendix F - Addendum to the Statement of Common Ground with Westminster City Council

Given that, as noted above, in London the majority of strategic issues are addressed through the preparation of the London Plan, the Council considers that the level of cooperation detailed in the Statements of Common Ground is proportionate to the matters being addressed through the preparation of the Local Plan, in line with the PPG.

The Council published draft Statements of Common Ground with neighbouring authorities on its website at the time of the publication of the Camden Local Plan Proposed Submission Draft (Regulation 19 stage). These were subsequently updated and submitted to the Planning Inspectorate with the Local Plan in October 2025.

In addition, as set out in paragraph 3.23 of the Duty to Co-operate Statement (SD17), the Council has previously agreed Statements of Common Ground with neighbouring authorities as part of the preparation of their Local Plans. Here, a Statement of Common Ground was signed with the LB Barnet in December 2021 (see Appendix G to this letter); LB Brent in April 2020 (see Appendix H); the City of London in September 2020 and April 2024 (see Appendix I); LB Islington in July 2019 (see Appendix J); and with Westminster City Council in November 2019 and September 2024 (see Appendix K).

The Council considers that the Statements of Common Ground agreed with neighbouring authorities demonstrate that the Local Plan has been prepared based on effective cooperation on strategic matters and that the strategy set out in the Local Plan is based on agreements with other authorities, in line with the PPG.

### **Prescribed Bodies**

**At paragraph 1.3 of document SD17 the Council lists relevant prescribed bodies. Please confirm whether the Council has prepared SoCGs with any prescribed bodies and if so, when are they to be submitted. If not, please explain why they are considered unnecessary. (paragraph 10)**

The Council has prepared Statements of Common Ground with the following prescribed bodies:

- Mayor of London (SD19 Statement of Common Ground with the GLA)
- Transport for London (attached at Appendix L to this letter)
- Historic England (attached at Appendix M)
- Environment Agency (attached at Appendix N)
- Natural England (attached at Appendix O)
- North Central London Integrated Care Board (attached at Appendix P).

The Council does not consider it necessary to prepare Statements of Common Ground with the remaining prescribed bodies, for the following reasons:

- Civil Aviation Authority (CAA) – Camden does not have any airports or airfields and the CAA has not commented on, or engaged on, the Camden Local Plan.

There are no conceivable “*strategic matters*” necessitating engagement. Given this, it is not considered necessary or proportionate to prepare a Statement of Common Ground.

- Homes and Communities Agency (HCA) – In London this function is fulfilled by the GLA. The Council has prepared a Statement of Common Ground with the GLA.
- Office of Road and Rail (ORR) - The ORR were consulted as part of the call for views held at the end of 2022/23 to inform the preparation of the Local Plan. They were also consulted on the draft Local Plan at both Regulation 18 and Regulation 19 stage and have not provided any comments. The ORR’s website advises that councils do not need to consult them if there are no implications for the railway. We do not consider that the Local Plan has any specific implications, however, we have continued to consult the ORR on the Plan to allow them to raise any issues. Given this, it is not considered necessary or proportionate to prepare a Statement of Common Ground with the ORR as there are no strategic matters necessitating engagement.
- Integrated Transport Authority (ITA) – In London this function is fulfilled by Transport for London (TfL). The Council has prepared a Statement of Common Ground with TfL.
- Highway Authority (HA) - In London this function is fulfilled by both TfL and the boroughs. The Council has prepared a Statement of Common Ground with TfL.
- Marine Management Organisation (MMO) – Camden is not a coastal authority and there are no conceivable “*strategic matters*” necessitating engagement. The MMO has not commented on, or engaged on, the Camden Local Plan. Given this, it is not considered necessary or proportionate to prepare a Statement of Common Ground.

**Beyond formal consultation stages (such as Regulation 18 and Regulation 19), what evidence is there to demonstrate that the Council has worked with prescribed bodies constructively, effectively and on an ongoing basis throughout the plan making process? (paragraph 11)**

The Council has constructively engaged with prescribed bodies in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan, providing an opportunity for the relevant “*strategic matters*” to be grappled with and any concerns in relation to the Plan to be addressed.

### **Mayor of London**

The Council and the Greater London Authority (GLA) on behalf of the Mayor of London have had on-going duty to cooperate meetings throughout the Local Plan preparation process. Notes of these meetings can be found in Appendix 1 of the Statement of Common Ground with the GLA (document reference SD19).

The GLA were also consulted as part of the call for views held at the end of 2022/23 to inform the preparation of the Local Plan, and as part of the consultation on the

Gypsy and Traveller Site Identification Study at the end of 2024/25, however no comments were received.

### ***Transport for London***

Transport for London (TfL) is London's integrated transport authority and a functional body of the Greater London Authority. Strategic transport planning matters for London are covered by the London Plan, to which Transport for London are a key stakeholder, and Camden and other boroughs engage with the preparation of the London Plan. In relation to transport, there are no strategic matters that would have a significant impact on at least two planning areas that remain to be addressed through the Local Plan.

Officers from Camden's Planning and Transport Services and TfL's Spatial Planning team have quarterly liaison meetings, providing an opportunity for strategic transport matters to be discussed. The Council also has regular meetings with TfL to discuss the Euston Area Plan. TfL have not raised any concerns in relation to the Local Plan and strategic transport matters at these meetings or in their responses to the consultations on the Local Plan.

TfL were also consulted as part of the call for views held at the end of 2022/23 to inform the preparation of the Local Plan, and as part of the consultation on the Gypsy and Traveller Site Identification Study at the end of 2024/25, however no comments were received.

The Statement of Common Ground that the Council has signed with TfL confirms that there are no "*strategic matters*" in relation to the Camden Local Plan Proposed Submission Draft upon which TfL have any concerns, and that TfL are satisfied that the duty to co-operate has been met (see Appendix L to this letter).

### ***Historic England***

In London, planning and co-operation on strategic matters are generally covered by the London Plan, with more locally specific matters covered in local plans. Historic England are a key stakeholder on the London Plan and Camden and other boroughs engage on the preparation of the Plan. The main strategic matter to be addressed through the duty to co-operate for the London Borough Camden and Historic England is tall buildings, including site allocations, and their impact on heritage assets.

The Council has engaged with Historic England in a constructive, proportionate and effective manner throughout the preparation of the Local Plan, providing an opportunity for strategic matters to be discussed, and concerns in relation to the Plan to be addressed.

As part of this Historic England have been consulted on the Sustainability Appraisal and Scoping Report for the Local Plan, the call for views held at the end of 2022/23 to inform the preparation of the Local Plan, and as part of the consultation on the Gypsy and Traveller Site Identification Study at the end of 2024/25. Historic England's response to these consultations is set out in Appendix M to this letter.

The Statement of Common Ground that the Council has signed with Historic England confirms that Historic England consider that the duty to co-operate has been met in relation to the production of the Local Plan (see Appendix M).

### ***Environment Agency***

In London, planning and co-operation on strategic matters concerning the environment are generally covered by the London Plan, with more locally specific matters covered in local plans. The Environment Agency are a key stakeholder on the London Plan and Camden and other boroughs engage in its preparation. Given this, and as Camden is in Flood Zone 1 with no rivers or coastline, there are no strategic environmental matters to be addressed through the Camden Local Plan Proposed Submission Draft relevant to the duty to co-operate.

The London Borough Camden has engaged with the Environment Agency throughout the preparation of the Local Plan, including on the preparation of the Sustainability Appraisal and Habitats Regulation Assessment, as part of the call for views held in late 2022/23, and on the Gypsy and Traveller Site Identification Study, providing an opportunity for strategic environmental matters to be discussed. Where comments have been received from the Environment Agency in response to the above consultations these are set out in Appendix N to this letter.

The Environment Agency have not raised any concerns in relation to the Local Plan. They consider the Plan to be sound and are satisfied that the duty to co-operate has been met (see Appendix N).

### ***Natural England***

In London, planning and co-operation on strategic matters concerning the natural environment are generally covered by the London Plan, with more locally specific matters covered in local plans. Natural England are a key stakeholder on the London Plan and Camden and other boroughs engage in its preparation. There are no strategic natural environment matters to be addressed in the context of the Camden Local Plan Proposed Submission Draft that are relevant to the duty to co-operate.

The London Borough Camden has engaged with Natural England throughout the preparation of the Local Plan, including on the preparation of the Sustainability Appraisal and Habitats Regulation Assessment, as part of the call for views held in late 2022/23, and on the Gypsy and Traveller Site Identification Study, providing an opportunity for strategic natural environment matters to be discussed. Where comments have been received from Natural England in response to the above consultations these are set out in Appendix O to this letter.

Natural England have not raised any concerns in relation to the Local Plan and each of their responses stated that they have no comments to make. The Statement of Common Ground the Council has signed with Natural England confirms they are satisfied that the duty to co-operate has been met (see Appendix O).



### ***North Central London Integrated Care Board (NCL ICB)***

As previously noted, in London, planning and co-operation on strategic matters are generally covered by the London Plan, with more locally specific matters covered in borough local plans. The NHS Integrated Care Boards for London are a key stakeholder in the preparation of the London Plan and Camden and other boroughs also engage in its preparation. There are no strategic health matters to be addressed in the context of the Camden Local Plan Proposed Submission Draft relevant to the duty to co-operate.

Officers from the Camden's Planning Team attend regular Camden Local Estates Forum (LEF) meetings, arranged by the NCL ICB. This brings together a wide range of NHS partners and relevant Council services and provides an opportunity for discussion and co-ordination on strategic health, planning and estates matters. The Council also engaged with NHS partners as part of the preparation of the Infrastructure Delivery Plan and on the Health Impact Assessment of the draft Local Plan.

The NCL ICB were also consulted as part of the call for views held at the end of 2022/23 to inform the preparation of the Local Plan, and as part of the consultation on the Gypsy and Traveller Site Identification Study at the end of 2024/25. Where comments have been received from the NCL ICB in response to the above consultations these are set out in Appendix P to this letter.

The Statement of Common Ground that the Council has signed with the NCL ICB confirms that the NCL ICB consider that the duty to co-operate has been met in relation to the production of the Local Plan (see Appendix P).

As set out above, the Council does not consider that there are any strategic matters to be addressed through the duty to cooperate with the Civil Aviation Authority, Homes and Communities Agency, Office of Road and Rail, Integrated Transport Authority, Highway Authority and Marine Management Organisation.

### **Outstanding Matters**

**Can the Council confirm whether there any outstanding Duty to Cooperate matters with neighbouring authorities or prescribed bodies, including details of what they are.**

The Council can confirm that there are no outstanding duty to co-operate matters with neighbouring boroughs or prescribed bodies. This is evidenced by the Statements of Common Ground the Council has signed with prescribed bodies (see Appendices L to P and SD19 Statement of Common Ground with the GLA) and the addendums to the Statements of Common Ground that the Council has signed with neighbouring boroughs (see Appendices A to F to this letter).

## **Plan Outcomes**

**The Council is asked to provide a clear narrative to explain how ongoing engagement on key strategic matters with relevant bodies through the Duty to Cooperate informed key outcomes for the Plan. Cross reference should be made, where relevant, to specific meetings with other local planning authorities and prescribed bodies. Evidence to support this should be provided, such as agendas/ minutes of meetings, redacted as may be necessary. Where appropriate to support the explanation, earlier versions of SoCG may also assist in demonstrating how discussions evolved and that they were active. (paragraph 13)**

As London has a spatial development strategy, the majority of strategic matters that would have a significant impact on at least two planning areas are considered at a London-wide level through the London Plan, with more locally specific matters covered in borough local plans. The key outcomes are contained in the adopted London Plan. The Council, along with other London boroughs and key stakeholders, engaged with the GLA as part of the preparation of the London Plan.

A set out in our response to paragraph 7 of your letter above, we consider that the key strategic matters to be addressed through the duty to co-operate in relation to the preparation of the Camden Local Plan are:

- meeting the London Plan identified housing need
- meeting the accommodation needs of Gypsies and Travellers
- tall buildings, including site allocations.

Information on the engagement that the Council has undertaken with prescribed bodies as part of the preparation of the Local Plan in respect of the above strategic matters and how this has informed key outcomes for the Plan is set out below.

Notes of the meetings held with neighbouring boroughs and prescribed bodies as part of the preparation of the Local Plan, where the above strategic matters were discussed, are set out in the Statements of Common Ground appended to this letter.

### ***Meeting housing need***

As part of the preparation of the Local Plan the Council has engaged with the GLA on an on-going basis on the approach to meeting housing need taken in the Local Plan. This is evidenced in the meeting notes between the Council and the GLA set out in Appendix 1 of the Statement of Common Ground with the GLA – SD19, which cover the period from May 2021 to September 2025. This dialogue has helped to ensure that the approach taken in the Local Plan is consistent with Policy H1 of the London Plan.

The Council has also been working with the GLA on the new Strategic Housing Land Availability Assessment for London (LAND4LDN exercise), to ensure appropriate development opportunities are identified and provide capacity-based evidence to

inform the housing target for the borough in the next London Plan. Work on the LAND4LDN exercise started in 2022 and is on-going.

In addition to this, the GLA have also provided formal comments on the Council's policy approach to meeting housing need, at both Regulation 18 stage and Regulation 19 stage.

In their response to the consultation on the draft Local Plan (Regulation 18 stage) the GLA requested that the Plan include a clear commitment to meet Camden's London Plan 2021 housing target by 2029, factoring in any shortfall, with clarity on how that would be achieved. They expressed concern that the draft Plan target of 11,550 homes over a 15-year plan period is significantly below the current London Plan target if annualised, but welcomed recognition in the draft Plan that the forthcoming review of the London Plan would likely change Camden's housing target. They also referred to the ongoing SHLAA / LAND4LDN work, which is part of the review of the London Plan and may identify additional sites. The GLA also advised that the Council should ensure that in the evidence base to support the draft Plan, densities are set at an appropriate level to make the best use of land.

The Council met with the GLA in February 2024, as part of the continuing engagement on the draft Local Plan, to discuss their comments and provide further information on the work the Council was undertaking in relation to setting the housing target in the Plan.

Subsequently, in response to the comments made by the GLA, the Council updated the Plan to make it clear that the imminent 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.

Furthermore, the Council continued to engage with the GLA on the proposed housing target in the Local Plan and discuss how the housing target had been derived (see Appendix 1 of the Statement of Common Ground with the GLA – SD19). The GLA subsequently advised at a duty to co-operate meeting in December 2024 that the housing target set in the Plan for the period beyond the end of the London Plan housing target was not likely to be a general conformity issue.

The GLA's response to the consultation on the Camden Local Plan Proposed Submission Draft however stated that, as written, the Mayor considered that the draft Plan was not in general conformity with the London Plan due to the proposed housing targets over the Plan period. The GLA also commented that:

- The proposed drop in the housing target is considered significant and is not consistent with paragraph 0.0.21 of the LP2021 which is clear that boroughs should only alter their housing targets where they have evidence demonstrating that they can exceed them.
- Whilst the above approach [to setting the housing target in the Local Plan] is in line with London Plan paragraph 4.1.11, in the context of working towards delivering 88,000 homes per annum as calculated at a national level through the standard method, this approach (specifically the text in 4.1.11) is now considered to be out of date.

- Boroughs who are currently working on their Local Plan, such as LBC, should seek, as a minimum, to roll over the current London Plan target beyond 2028/29, including any shortfall accrued to date, and to continue to take proactive measures to increase housing supply.
- Consideration may need to be given to committing to an early Local Plan review following the publication of LBC's new housing targets within the emerging London Plan.

The Council's response to the comments made by the GLA in their representation on the Camden Local Plan Proposed Submission Draft are set out in the consultation response spreadsheet (submission document SD31).

The Council then met with the GLA in September 2025 to discuss the comments raised, the Council's response to them and how best to resolve them through a Statement of Common Ground. Following this, it was agreed that the Council would provide further information to the GLA to address their concerns in relation to the housing target in the Local Plan.

The Council has now agreed a Statement of Common Ground with the GLA on behalf of the Mayor of London. This focuses on areas of agreement and disagreement between Camden and the GLA in respect of the matters raised by the GLA in their response to the consultation on the Plan.

As part of the Statement of Common Ground the Council and the GLA have agreed a series of amendments to the Plan to respond to their comments around meeting housing need. These are set out in the Statement of Common Ground with the GLA (ref SD19) and in the Schedules of Proposed Main and Minor Modifications (ref SD50 and SD51). They are also set out below for ease:

- Policy H1 Part A – The Council will aim to deliver at least 11,550 additional homes from 2026/27 to 2040/41. This includes the final three years of the London Plan 2021 housing target for Camden (1,038 homes per year for years 2026/27, 2027/28 and 2028/29 of the Plan period).
- Paragraph 7.7 - The Local Plan aims to deliver 11,550 additional homes ~~(770 homes per year)~~ in Camden over the Plan period 2026/27 to 2040/41.

The Statement of Common Ground confirms that there are no unresolved issues between the Council and the GLA in respect of the approach to meeting housing need in the Local Plan and that subject to the proposed modifications set out above, the Mayor considers that the proposed housing targets over the Plan period are in general conformity with the London Plan (see submission document SD19).

Alongside the formal consultation stages, the Council has also held regular duty to co-operate meetings with neighbouring boroughs (LB Brent, LB Barnet, City of London, LB Islington, LB Haringey and Westminster City Council), as part of the preparation of the Local Plan. At these meetings housing was a standard item on the meeting agenda and the approach to meeting housing need was discussed. This is evidenced in the meeting notes between the Council and the other borough's which are set out in Appendices A to F, and which cover the period from 2018 to 2025.

Furthermore, none of our neighbouring boroughs have raised any objection to our approach or sought any change to the Plan in relation to this matter. All boroughs have also been involved in the LAND4LDN exercise led by the GLA.

Given the shortage of available sites for housing development in Camden, in May 2025, the Council wrote to all other London boroughs under the duty to co-operate asking whether they were able to assist Camden in identifying a five year housing land supply of deliverable sites at examination.

Replies were received from the following boroughs - Barnet, Havering, Islington, Lambeth, Lewisham, Newham, Redbridge, Richmond, Southwark, Tower Hamlets, Wandsworth and Waltham Forest. All confirmed that they are not in a position to assist. Barnet, Brent, City of London, Haringey, Islington and Westminster have also confirmed through their Statements of Common Ground with Camden that they are not in a position to assist (see submission documents SD20, SD21, SD22, SD23, SD24 and SD25).

In September 2025, the Council contacted all boroughs who did not reply to the duty to co-operate letter sent in May 2025, asking them to confirm their position. Replies were received from Bexley, Bromley, Ealing, Enfield, Greenwich, Hackney, Hillingdon, Hounslow and Merton. All confirmed that they were not in a position to assist.

### ***Gypsy and Traveller accommodation***

The Council has worked with the GLA on the London-wide Gypsy and Traveller Accommodation Needs Assessment. This was commissioned by the GLA to provide an evidence base for housing and planning policy development and will inform the strategic approach in the next London Plan. Work on the study has been on-going since 2022, and the findings of the study have just been published (see document reference EB14).

The Council has also engaged with the GLA on an on-going basis, throughout the preparation of the Local Plan, in respect of the approach to Gypsy and Traveller accommodation provision, with discussions on this matter first starting as part of the preparation of the draft Site Allocations Local Plan. This is evidenced in the meeting notes between the Council and the GLA set out in Appendix 1 of the Statement of Common Ground with the GLA – SD19, which cover the period from May 2021 to September 2025. This dialogue has helped to ensure that the approach taken in the Local Plan is consistent with Policy H14 of the London Plan.

In addition to this, the GLA have also provided formal comments on the Council's policy approach to Gypsy and Traveller accommodation, at both Regulation 18 stage and Regulation 19 stage.

In their response to the consultation on the draft Local Plan (Regulation 18 stage) the GLA stated that the Plan should use site allocations to explore opportunities to meet the need for pitches for Gypsies and Travellers. The GLA also stated the Council should plan to meet identified need and must include the ten-year pitch targets in Policy H11 Accommodation for Travellers.

The Council met with the GLA in February 2024, as part of the on-going engagement on the draft Local Plan, to discuss their comments and provide further information on the work the Council was undertaking to help meet the accommodation needs of Gypsies and Travellers in the Plan.

The Local Plan was subsequently updated to allocate two sites for the provision of Gypsy and Traveller accommodation. The supporting text to Policy H11 also sets out the provisional need for Gypsy and Traveller pitches over the period to 2031/32 based on the (at the time) provisional findings of the London-wide Gypsy and Traveller Accommodation Assessment.

The GLA's response to the consultation on the Camden Local Plan Proposed Submission Draft stated that the Council should clearly set out their ten-year pitch target in Policy H11 and how they plan to meet those needs in full. The GLA's response then went on to state that if the Council cannot meet the ten-year pitch target, this would be a general conformity issue.

The Council's response to the comments made by the GLA in their representation on the Camden Local Plan Proposed Submission Draft are set out in the consultation response spreadsheet (submission document SD31).

The Council then met with the GLA in September 2025 to discuss their comments and the Council's response and has agreed a Statement of Common Ground with the GLA on behalf of the Mayor of London. This focuses on areas of agreement and disagreement between Camden and the GLA in respect of the matters raised by the GLA in their response to the consultation on the Plan.

As part of the Statement of Common Ground the Council and the GLA have agreed a series of amendments to the Plan to respond to their comments around Gypsy and Traveller accommodation. These are set out in the Statement of Common Ground with the GLA (ref SD19) and in the Schedules of Proposed Main and Minor Modifications (ref SD50 and SD51). They are also set out below for ease:

- Policy H11. Part A - "The Council will aim to secure a sufficient supply of pitches / plots to meet the accommodation needs of Camden's established traveller community over the Plan period to 2041. This includes a target of thirteen additional pitches by 2035/36."
- Policy H11. Part C - "To help meet the accommodation needs of Camden's established traveller community the following sites have been allocated in the Local Plan to deliver six permanent traveller pitches..."
- Policy H11. Part D - "The Council will support the delivery of windfall sites to help meet the accommodation needs of Camden's Traveller community. The Council will require new sites, pitches and/or plots for Travellers to:..."
- Paragraph 7.361 - "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 have undertaken ~~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 assessed estimated to be 19 additional pitches (including the four existing pitches in Camden).”

- Two new paragraphs are proposed after paragraph 7.364:
  - “It is envisaged that the land adjacent to Constable House (Site Allocation C27) could accommodate two Gypsy and Traveller pitches and that the land at York Way Depot and adjacent land at Freight Lane (Site Allocation S20) could accommodate up to four Gypsy and Traveller pitches. However, further design and feasibility work will be required to establish the exact number of pitches that can be delivered on these sites. A further pitch has also recently been provided on the existing Traveller site at Carol St, which also counts towards meeting the identified need.
  - This means there is a shortfall of six pitches against the Council’s ten year pitch target of 13 pitches to 2035/36. Given this, Policy H11 supports the delivery of windfall sites (unallocated sites) to help meet this need subject to the criteria set out in Policy H11 Part D.”

The Statement of Common Ground confirms that there are no unresolved issues between the Council and the GLA in respect of the approach to Gypsy and Traveller accommodation in the Local Plan (see submission document SD19).

Alongside the formal consultation stages, the Council has also held regular duty to co-operate meetings with neighbouring boroughs (LB Brent, LB Barnet, City of London, LB Islington, LB Haringey and Westminster City Council), as part of the preparation of the Local Plan. At these meetings Gypsy and Traveller accommodation was a standard item on the meeting agenda and the approach to meeting the accommodation needs of Gypsies and Travellers was discussed. This is evidenced in the meeting notes between the Council and the other borough’s which are set out in Appendices A to F, and which cover the period from 2018 to 2025. Furthermore, none of our neighbouring boroughs have raised any objection to our approach or sought any change to the Plan in relation to this matter. All boroughs have also been involved in the London-wide Gypsy and Traveller Accommodation Assessment led by the GLA.

Although the Camden Local Plan Proposed Submission Draft allocates sites for the provision of Gypsy and Traveller accommodation it does not fully meet Camden’s identified need. Therefore, in May 2025 the Council wrote to all other London boroughs, under the duty to cooperate, to ask whether they were able to assist in meeting these needs.

Replies were received from the following boroughs - Barnet, Havering, Islington, Lambeth, Lewisham, Newham, Redbridge, Richmond, Southwark, Tower Hamlets, Wandsworth, and Waltham Forest. All confirmed that they were not in a position to assist. Barnet, Brent, City of London, Haringey, Islington and Westminster have also confirmed through their Statements of Common Ground with Camden that they are not in a position to assist (see submission documents SD20, SD21, SD22, SD23, SD24 and SD25).

In September 2025, the Council contacted all boroughs who did not reply to the Duty to Co-operate letter sent in May 2025, asking them to confirm their position. Replies were received from Bexley, Bromley, Ealing, Enfield, Greenwich, Hackney, Hillingdon, Hounslow and Merton. All confirmed that they were not in a position to assist.

To inform the approach taken to meeting the needs of Gypsies and Travellers in the Plan, the Council also published the Gypsy and Traveller Site Identification Study (document ref EB12) for comment from December 2024 to January 2025 and neighbouring boroughs and prescribed bodies were notified of this. Comments were received from Historic England on the Gypsy and Traveller Site Identification Study (see Appendix M). No other comments were received from neighbouring boroughs and prescribed bodies on the study.

### ***Tall Buildings***

The Council first started discussions with the GLA about the approach to tall buildings in May 2021, as part of the preparation of the draft Site Allocations Local Plan. Following the decision to take the draft site allocations forward as part of the review of the Local Plan, the Council has subsequently had an ongoing dialogue with the GLA, throughout the preparation of the Local Plan, in respect of the approach to tall buildings. This is evidenced in the meeting notes between the Council and the GLA set out in Appendix 1 of the Statement of Common Ground with the GLA – SD19, which cover the period from May 2021 to September 2025. This dialogue has helped to ensure that the approach taken in the Local Plan is consistent with Policy D9 of the London Plan.

In addition to this, the GLA have also provided formal comments on the Council's policy approach to tall buildings, at both Regulation 18 stage and Regulation 19 stage.

In their response to the consultation on the draft Local Plan (Regulation 18 stage) the GLA welcomed the definition of tall buildings in Part A of policy D2 as consistent with Policy D9 of the London Plan. However, they suggested that the Council should consider whether it would be more appropriate to identify areas, rather than specific sites, as suitable for tall buildings. The Council considers that the Plan is clear that tall buildings outside of the identified locations will be assessed against policy D2, London Plan policy D9 and other relevant policies. Given this, no change to the Plan was considered necessary.

The Council met with the GLA in February 2024, as part of the consultation on the draft Local Plan, to discuss their comments and provide further information on the approach taken to tall buildings in the Plan.

In the GLA's response to the Camden Local Plan Proposed Submission Draft they re-confirmed that the definition of tall buildings in Part A of policy D2 was consistent with Policy D9 of the London Plan. However, they recommended that appropriate heights are included within Figure 22 or Table 12 of the Plan, to provide clarity on what heights may be acceptable in the identified locations. The GLA also stated that viewing corridors which run through Camden should be taken into consideration



when planning for tall buildings and recommended that the London View Management Framework (LVMF) view corridors are included within the Policies Map and local plan.

The Council's response to the comments made by the GLA in their representation on the Camden Local Plan Proposed Submission Draft are set out in the consultation response spreadsheet (submission document SD31).

The Council subsequently met with the GLA in September 2025 to discuss their comments and the Council's response and has agreed a Statement of Common Ground with the GLA on behalf of the Mayor of London. This focuses on areas of agreement and disagreement between Camden and the GLA in respect of the matters raised by the GLA in their response to the consultation on the Plan. This confirms that there are no unresolved issues between the Council and the GLA in respect of the approach to tall buildings in the Local Plan and no changes to the Plan are required (see submission document SD19).

Alongside the formal consultation stages, the Council has also held regular duty to co-operate meetings with neighbouring boroughs (LB Brent, LB Barnet, City of London, LB Islington, LB Haringey and Westminster City Council), as part of the preparation of the Local Plan. At these meetings tall buildings (including site allocations) were discussed.

As the London Borough of Camden, Westminster City Council and the City of London are also covered by strategic viewing corridors (identified in the Mayor's London View Management Framework), these was also discussed at the duty to co-operate meetings with these boroughs, in the context of planning for tall buildings.

This is evidenced in the meeting notes between the Council and the other borough's which are set out in Appendices A to F, which cover the period from 2018 to 2025.

Whilst the London Borough of Islington made a formal comment at both Regulation 18 stage and Regulation 19 stage on the approach to tall buildings taken in the Plan. None of the other neighbouring borough's have requested a change to the Plan in relation to the approach taken to tall buildings or strategic views.

The London Borough of Islington commented on Policy D2 tall buildings as part of the consultation on the draft Local Plan. The Council subsequently amended this policy in response to their comments to include the consideration of the relationship between the building and neighbouring boroughs where tall buildings are proposed close to the borough boundary.

The Council met with the London Borough of Islington in June 2025 to discuss their comments and our response to them. At this meeting Islington mentioned that there was some text missing from their response. This was subsequently provided by the London Borough of Islington in response to the consultation on the Proposed Submission Draft Local Plan.

In response to the further comments made by Islington on the Camden Local Plan Proposed Submission Draft the Council have proposed a modification to Policy D2 Tall Buildings Part C.8 to add reference to the need to consider impact on

neighbouring boroughs (see SD51 Schedule of Proposed Main Modifications, Responder ID 606).

The Council's response to the comments made by Islington in their representation on the Camden Local Plan Proposed Submission Draft are set out in the consultation response spreadsheet (submission document SD31).

The Council have agreed a Statement of Common Ground with Islington which confirms that there are no unresolved issues in respect of the approach to tall buildings in the Local Plan (see submission document SD24 and Appendix E).

Historic England commented on the approach to tall buildings in the draft Local Plan and welcomed the introduction of a specific tall buildings policy. In their response they stated that they considered that a reference to avoiding any adverse impacts on the historic environment should be included within the policy itself. In response to their comments a criterion relating to the historic environment was added into Policy D2.

Historic England also asked for additional clarity on the analysis in the Building Heights Study and the effects on heritage significance and historic character. The Council and Historic England then had a meeting to discuss the Local Plan in September 2024. Subsequently Historic England provided further comments on a number of site allocations. These were considered by the Council and amendments were made to site allocation policy S8 St Pancras Hospital, site allocation policy C15 Wendling Estate and St Stephens Close, C10 Juniper Crescent and C11 Network Rail land at Juniper Crescent.

Historic England's response to the Proposed Submission Draft Local Plan welcomed the amendments made to the Plan as a result of their comments and subsequent discussions, including those made to Policy D2 on tall buildings.

The Council's response to the comments made by Historic England in their representation on the Camden Local Plan Proposed Submission Draft are set out in the consultation response spreadsheet (submission document SD31).

The Council have agreed a Statement of Common Ground with Historic England which focuses on areas of agreement and disagreement between Camden and Historic England in respect of the matters raised by Historic England in their response to the consultation on the Plan (see Appendix M).

### **Summary**

The Council has engaged with the prescribed bodies on key strategic matters through the duty to cooperate in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan and this engagement has informed key outcomes for the Plan as set out above.

Through the duty to co-operate process the Council has also engaged with prescribed bodies in relation to local, non-strategic matters (which do not have a significant impact on at least two planning areas). Further detail on this and how it has informed the content of the Local Plan is set out in Appendix Q to this letter.

The Council notes the Written Ministerial Statement on 'Reforming Local Plan Making' issued on 27 November 2025 and the letter of the same date from the Minister of State for Housing and Planning to the Chief Executive of the Planning Inspectorate on 'Local plan reforms – Update to the Duty to Co-operate'. These confirm that the duty to co-operate will not be 'saved' in the forthcoming new plan-making regulations. Therefore, the requirement will be removed for plans in the current system, with the Duty ceasing to apply when the Regulations come into force early next year. The Secretary of State's letter notes that Local Planning Authorities should continue to collaborate across boundaries and that plans should continue to be examined in line with the policies in the NPPF on 'maintaining effective co-operation'.

The Council considers that, whether the duty to co-operate is a statutory requirement or a policy matter relevant to soundness, the duty has been met in relation to the Camden Local Plan, effective co-operation has been maintained, and the effectiveness of the Plan has been maximised.

### **General Conformity with the London Plan**

**The Council has indicated their intention to submit a SoCG with the Greater London Authority (GLA). To supplement this and the submitted General Conformity Statement (SD18), please can the Council provide a table setting out your position on general conformity with the London Plan for each policy in their plan. This should include any reasons for variance and the Council's understanding of the GLAs position in each case. (paragraph 14)**

The Camden Local Plan London Plan Policy Assessment is attached at Appendix R.

As set out in section 2 of the Council's General Conformity Topic Paper (TP01), it is a requirement that local plans, taken as a whole, must be in general conformity with the spatial development strategy as whole. The Council considers that the Camden Local Plan Proposed Submission Draft as a whole is in general conformity with the London Plan 2021 as a whole, and this is confirmed in the Statement of Common Ground between the Council and the GLA (SD19).

The Council also considers that individual Local Plan policies are consistent with individual London Plan policies as set out in Appendix R. The GLA have confirmed in the Statement of Common Ground that there are no outstanding issues related to strategic matters raised in the Mayor's Regulation 19 response.

### **Housing Land Supply**

**Please can the Council complete the attached table (Annex A) for each site that the Council assumes will contribute to the 5 year housing land supply on adoption and that will contribute to the overall housing land supply position over the whole plan period. (paragraph 15)**

The Camden housing land supply table is attached at Appendix S.

## **Infrastructure**

**I note the Infrastructure Delivery Plan that the Council has submitted (document EB43). To supplement this, please complete the attached table (Annex B) for each site allocation, identifying what infrastructure is required under each of the different categories. (paragraph 16)**

The site allocations infrastructure requirements table is attached at Appendix T.

I hope this letter provides you with the information required. Should you have any further questions, then please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in cursive script, reading "R. Burden".

Rebecca Burden  
Development Plans Manager

## **List of appendices**

Appendix A – Addendum to the Statement of Common Ground with the LB Barnet

Appendix B - Addendum to the Statement of Common Ground with the LB Brent

Appendix C - Addendum to the Statement of Common Ground with the City of London

Appendix D - Addendum to the Statement of Common Ground with the LB Haringey

Appendix E - Addendum to the Statement of Common Ground with the LB Islington

Appendix F - Addendum to the Statement of Common Ground with Westminster City Council

Appendix G – Previous Statement of Common Ground with the LB Barnet dated December 2021

Appendix H – Previous Statement of Common Ground with the LB Brent dated April 2020

Appendix I - Previous Statement of Common Ground with the City of London dated September 2020 and April 2024

Appendix J - Previous Statement of Common Ground with the LB Islington dated July 2019

Appendix K - Previous Statement of Common Ground with Westminster City Council dated November 2019 and September 2024

Appendix L - Statement of Common Ground with Transport for London

Appendix M - Statement of Common Ground with Historic England

Appendix N - Statement of Common Ground with the Environment Agency

Appendix O - Statement of Common Ground with Natural England

Appendix P - Statement of Common Ground with the North Central London Integrated Care Board

Appendix Q – Engagement with prescribed bodies on non-strategic matters

Appendix R – Camden Local Plan London Plan Policy Assessment

Appendix S – Camden Housing Land Supply table

Appendix T – Site Allocation Infrastructure Requirements table

Appendix U – GLAs response to the consultation on the draft Site Allocations Local Plan and draft Local Plan.