Statement of Common Ground between the London Borough of Camden and the Mayor of London

concerning the Camden Local Plan Proposed Submission Draft

November 2025

Version: 3

Overview

- 1.1 This document represents a Statement of Common Ground (SoCG) between the London Borough of Camden and the Mayor of London sets out the parties' agreed positions in relation to relevant strategic matters identified during Duty to Cooperate meetings and as set out in the Mayor's Regulation 19 representation on the Camden Local Plan Proposed Submission Draft.
- 1.2 The London Borough of Camden is reviewing its Local Plan to ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics. The Council published the Camden Local Plan Proposed Submission Draft for comment in May June 2025. The draft Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this.
- 1.3 The Greater London Authority (GLA) on behalf of the Mayor of London provided a response to the Proposed Submission Draft Camden Local Plan on 12 June 2025.
- 1.4 The Mayor of London is responsible for producing the London Plan, which sets out the strategic vision for the development of London over the next 20-25 years. This includes policies on the provision of housing, the management of waste, protection of the environment, and promotion of economic development.

Duty to co-operate

2.1 London Borough of Camden and the GLA have had a number of Duty to Cooperate meetings throughout the Local Plan process. Notes of these meetings can be found in Appendix 1 to this report.

Key strategic matters

- 3.1 Through correspondence and discussions between London Borough of Camden and the GLA, the following have been identified as strategic issues for continued liaison:
 - Euston Opportunity Area
 - Housing Targets
 - Affordable Housing
 - Gypsy and Traveller accommodation
 - Tall Buildings
 - Industrial Land

Matters where the parties agree

- 4.1 As set out in the table below, agreement has been reached in relation to strategic matters raised within the Mayor's Regulation 19 response. There are no outstanding issues related to these matters at this time.
- 4.2 Both parties agree that the Camden Local Plan reflects the London Plan 2021 (LP2021) housing targets over the period 2019/20 to 2028/29 (including for small sites) but that further clarity would be provided by additional reference to the targets for the period to 2028/2029 and post 2029. LBC agree to present proposed modifications to Policy H1 Part A and paragraph 7.7 as set out in the table below. Subject to the proposed modifications, the Mayor considers that the proposed housing targets over the Plan period are in general conformity with the London Plan.
- 4.3 Both parties agree that the plan reflects the approach of the London Plan in respect of the affordable housing thresholds. LBC agree to present proposed modifications to Policy H4 supporting paragraphs 7.124 and 7.154 to provide further clarity on the approach to tenure mix and how development proposals that do not meet the applicable affordable housing requirements will be considered.
- 4.4 Both parties agree that the outcome of the emerging London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA), which will be published by the end of 2025, need to be reflected in the Plan. Camden agree to present proposed modifications to Policy H11 and supporting paragraphs to set out the borough's ten year pitch target reflecting the emerging London-wide GTANA.

Table of GLA representations and LB Camden response

- 5.1 The below table details the matters raised by the GLA on behalf of the Mayor of London as representations to the Camden Local Plan Proposed Submission Draft (Regulation 19), and the status of those representations.
- The table seeks to provide clarification and clarity to the extent to which matters raised by the Mayor are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between London Borough of Camden and the Mayor.

Subject	GLA Regulation 19 Response	Borough Response	Common Ground Agreed?
General conformity	The draft Local Plan is underpinned by a series of strategic objectives to help deliver the vision and ambitions of 'We Make Camden', which is a document that sets out the vision for the future of Camden. The strategic objectives of the draft Local Plan are broadly supported. However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan due to the proposed housing targets over the Plan period. Further detail on this is provided below.	LB Camden considers that the issues raised by the GLA are matters of soundness, rather than matters of general conformity. Further information is set out below and in our General Conformity Topic Paper.	Agreed. Subject to the proposed modifications set out below, the Mayor considers that the proposed housing targets over the Plan period are in general conformity with the London Plan.
Opportunity Areas (Policy S2)	LBC contains three Opportunity Areas (OAs) identified within LP2021 – Tottenham Court Road, Kings Cross and Euston. The draft Plan states that limited development is expected in the Tottenham Court Road OA as development there is largely complete, with development in the King's Cross Area mainly delivered through two site allocations. Table 2.1 of LP2021 sets out an indicative capacity for 2,800-3,800 homes in Euston OA along with 8,600-15,000 jobs. As set out in paragraph 2.1.1 of the LP2021, these figures should be used as a starting point to be tested through the assessment process. The	The housing capacity figure for the Euston Area included in the Local Plan (Policy S2) reflects the proposals in the draft Euston Area Plan 2023. This sets out that the revised housing projection for Euston is based on the outcomes from a design-led capacity study which took into account additional site constraints, less enabled land, higher costs, and viability issues. The draft EAP was published for consultation in early 2023 and the Mayor	Agreed. The Mayor agrees that the housing capacity figure included in the Local Plan should reflect the capacity figures in the emerging Euston Area Plan, noting that these figures are based on a design-led capacity study and

	draft Plan identifies that Euston is expected to deliver between 1,500 and 2,500 new homes. Noting that the indicative capacity is below that identified within Table 2.1, clarity on the capacity assumptions made for the Euston area by LBC would be welcomed. Draft Policy S2 seeks to ensure that development within this area is in line with the vision and objectives set out within the Euston Area Plan (EAP). Consultation (Regulation 18) on the draft Euston Area Plan was undertaken in March 2023. It is understood LBC is working towards consulting on the Regulation 19 version of the updated Plan in Winter 2025.	of London responded to that consultation. That response states at para 3.5 that: "As LBC have endeavoured to establish the capacity for growth in the Euston OA, taking account of the indicative capacity for homes and jobs in Table 2.1, there are no conformity issues with LP2021 Policy SD1".	that LBC will consult on the Regulation 19 EAP in Winter 2025.
Housing target	LBC's housing target as set out in Table 4.1 of the LP2021 is for the delivery of 10,380 new homes between 2019 and 2029 and incorporates a small site housing target of 3,280 new homes. This is equivalent to an annualised target of 1,038 homes a year. For LBC's entire Plan period, 2026-2041, it is the intention to deliver 11,550 new dwellings. This is equivalent to a total of 770 homes being delivered a year. 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	Para 0.0.21 of the London Plan states that "[] The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan." Paragraph 0.0.21 relates to circumstances where a borough is revisiting their London Plan housing target. This is not the case with the	Agreed. The Mayor acknowledges that the housing trajectory appropriately incorporates Camden's housing target from the London Plan 2021.

	evidence demonstrating that they can exceed	Camden Local Plan, which retains	
	them.	Camden's housing target from the	
	thom.	London Plan (that is,10,380 new homes	
		between 2019 and 2029). This is clearly	
		set out in paragraph 2.8 of the draft Local	
		Plan and in the Housing Trajectory.	
		The requirement for general conformity is	
		with the London Plan as the spatial	
		development strategy. The supporting /	
		explanatory text does not form part of the	
		spatial development strategy, which is set	
		out in the strategic plan's policies.	
		Paragraph 0.0.21 is explanatory text	
		rather than policy, so does not form part	
		of the spatial development strategy.	
		Paragraph 0.0.21 is therefore not a	
		relevant consideration in terms of the	
		Camden Local Plan or its general	
		conformity.	
Haveing toward	The duest Diese states that the boursing figures has	The Draw and Cubusiasian Draft Land	Assessed The Markey
Housing target	The draft Plan states that the housing figure has	The Proposed Submission Draft Local	Agreed. The Mayor
	been derived from the period of 2026 to 2029 of	Plan aims to deliver at least 11,550	welcomes the
	the London Plan, the housing capacity from large sites as set out in 2017 SHLAA, and the	additional homes in Camden over the	proposed modification that
	·	Plan period 2026/27 to 2040/41. This	clarifies that the
	small sites target of 328 new homes per year set out within LP2021. The draft Plan indicates that	target includes the final three years of the	Plan retains the
		London Plan 2021 housing target for	
	cumulative backlog from under-delivery of	Camden (1,038 homes per year for	London Plan 2021
	completed homes from 2019/20 has also been	2019/20 to 2028/29).	housing target for
	taken into account, which has been identified as		Camden up to
	a little over 1,700 homes by April 2026.		2028/29, and

As noted in the Regulation 18 consultation response, the current London Plan does not meet London's identified need and therefore the overall amount of housing required annually should not be expected to reduce. Whilst the above approach 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.

In response to the comments made by the GLA the following modifications are proposed to the Plan -

- 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.

As the Proposed Submission Draft Local Plan period continues for a further twelve years beyond 2028/29 (the period covered by the London Plan housing targets), a housing requirement has been set for the whole Plan period having regard to paragraph 4.1.11 of the London Plan 2021.

sites) and including a windfall allowance

acknowledges the significant amount of work the Council has undertaken to identify land for housing and optimise site capacity in setting a capacity-based target for the remainder of the plan period in accordance with paragraph 4.1.11 of the London Plan 2021.

The housing target in the Submission Draft Local Plan is a capacity-based target, comprising all expected housing delivery over the Plan period (from sites with planning permission and allocated

		for smaller sites (non-major development). The Council considers that it has done all it reasonably can to identify land for housing in the Local Plan and optimise site capacity, to maximise housing supply. Further information on this is set out in the Council's Site Selection and Allocation Topic Paper and Housing Topic Paper. Furthermore, the Local Plan adopts a number of proactive measures to support and promote the delivery of housing, as outlined our Housing Topic Paper.	
Housing target	The draft Plan acknowledges that the emerging London Plan will result in a new housing target for Camden once adopted, and as such the housing target contained within the Local Plan may only be in place for a short period of time. Whilst this is welcomed, it is recommended that there is flexibility in the draft Plan to safeguard for this eventuality. 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 difficult current delivery environment is also noted, including LBC's difficulties in bringing sites forward.	Paragraphs 2.8 and 7.7 of the Camden Local Plan Proposed Submission Draft both make it clear that the Council recognises that the new London Plan will set a new housing target for Camden. The housing target in the Camden Local Plan Proposed Submission Draft is therefore only an interim target, until the new London Plan is adopted. Once the new London Plan is adopted it will become part of the Camden's development plan. An early review is therefore not considered necessary.	Agreed.

Affordable Housing (Policy H4)

It is noted that the draft Plan identifies a borough wide delivery target of 3,000 additional affordable homes from 2026/27 to 2040/41. The draft Plan sets a capacity-based approach to affordable housing, with this being detailed in draft Policy H4. The threshold for this Policy starts at 100sqm and the creation of at least one additional unit, with each additional 100sqm equating to the creation of one home. For smaller developments, a sliding scale target will apply, which is discussed in detailed below.

For major developments, which have been defined within the draft Plan as being 16 units or more, draft Policy H4B5 states that the London Plan's strategic affordable housing target of 50 per cent will apply, but will be subject to the London Plan's viability threshold approach. Policy H4 of LP2021 refers to the strategic target of 50 per cent of all new homes delivered across London to be genuinely affordable. To achieve this aim, specific measures are identified, which include, but are not limited to, the requirement for major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach, using grant funding to increase affordable housing delivery, and for public sector land and industrial land resulting in a net loss of industrial capacity to deliver at least 50 per cent affordable housing.

The Council considers that strategic target is relevant to site-specific negotiations in two ways. Firstly, developers are expected to explore whether affordable housing can be increased beyond the viability threshold level using grant from the Affordable Homes Programme (London Plan Policy H4 Part A.2 and Policy H5 Part C.4 and paragraphs 4.4.4 and 4.5.11). Secondly, developments are subject to Early Stage Viability Review and Late Stage Viability Review (London Plan Policy H5 Parts E and F.2 and paragraphs 4.5.8 and 4.5.14). We consider that the strategic target has a role in the operation of these Viability Reviews, since the proportion of affordable housing sought through would otherwise be open-ended.

We acknowledge that the purpose of the reference to the strategic target in Local Plan Policy H4 Part B.5 may not be entirely clear, and needs to be read in the context of supporting paragraph 7.120 and the relevant sections of the London Plan.

Agreed. The Mayor acknowledges that the reference to the strategic target in Policy H4 part B.5 is in the context of the draft Plan's sliding scale for smaller developments and that supporting paragraph 7.120 provides the necessary clarity about how the London Plan threshold approach will be applied in Camden's circumstances.

be realised if negotiations continue past this point up to 50 per cent? It is recommended that the draft Policy H4B5 is amended to remove the reference to the strategic housing target.		
contributions for smaller developments is also proposed, starting at 2 per cent for developments with capacity for one additional home, increasing by 2 per cent for each home, reaching an affordable housing target of 30 per cent affordable housing for 15 units. The Mayor raises significant concerns that seeking affordable housing below 10 units is unlikely to support small builders and diversify the housing market. Overall, this is likely to be counterproductive in terms of both housing delivery and affordable housing delivery. Local Pla a succest local department of a succest local department of the product of t	examination of the current Camden Plan, the Council was able to make essful case to the Inspector for a eparture from the national ach in the light of the scale of able housing need in the borough. H4 maintains the position in the table Local Plan. The threshold for g contributions to affordable g, and the approach to utions from smaller developments, een devised to minimise the risk of essing the delivery of homes, and perated successfully since on of the Camden Local Plan in ording of Policy H4 in the ession Draft Local Plan reflects the sil's understanding of the GLA's	Agreed. The Mayor notes the evidence that the Council has prepared to support their proposed approach, which is a continuation of the current approach.

Council also provided evidence to the GLA, presented to the examination of the current Camden Local Plan, to demonstrate that the scale of developments can be supressed where there is an abrupt threshold at which the full affordable housing requirement applies.

We also note that footnote 50 to London Plan indicates that "Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites". The Council does not consider that seeking modest financial contributions from small housing developments will harm housing delivery from small developments or by small-scale builders, or harm affordable housing delivery. We consider that the Local Plan's approach will lead to the optimal quantum of housing on small sites, rather than encouraging developers to supress the quantum of development so that it falls below 1,000 sqm/ 10 homes.

Affordable housing	In terms of seeking affordable housing contributions for development schemes delivering 10 to 15 units, whilst the approach set out in the draft Policy differs from LP2021, given it is likely to promote small builders and reduce the 'cliff edge' impacts, it is considered to be an appropriate flexibility.	Comment noted.	Agreed.
Affordable housing	It is noted that there are references to tenure split being applied flexibly within the supporting text of the policy. Tenure mix is a policy criterion for viability assessments; therefore, it is recommended that this wording is removed.	The Council considers this aspect of the Local Plan is consistent with the London Plan. A measure of flexibility in the tenure split is inevitable, since the proportion of housing in each tenure will be assessed on the basis of floor area and/ or habitable rooms, but a development will be designed to provide a whole number of appropriately sized homes in each tenure. Policy H6 of the London Plan gives discretion to boroughs to choose between low-cost rent and intermediate tenures for 40% of the affordable housing, and is only prescriptive that there should be a minimum of 30% low-cost rented housing and a minimum of 30% intermediate housing. The London Plan also refers to flexibility over the tenure split in paragraphs 4.5.10 (for schemes with a high proportion of affordable housing), paragraph 4.6.11 (for schemes delivering more than 35% affordable housing) and paragraph 4.6.12	Agreed. The Mayor notes that Policy H4 Part B.6 sets a guideline tenure mix of 60% low-cost rented housing and 40% intermediate housing and considers the proposed modification to supporting paragraph 7.124 provides sufficient clarity about expectations regarding tenure mix.

		(for schemes assessed under the Viability Tested Route). However, to respond to the GLAs comments the following modification is proposed to paragraph 7.124 - "We will expect applications to adhere as closely as possible to the guideline mix set out in Policy H4 part B6. However, the The guideline mix will be applied flexibly taking into account the need to achieve a rational division of the development in terms of homes of appropriate sizes and tenures, and the criteria in Policy H4, and in In certain circumstances"	
Affordable housing	Draft Policy H4B(8) sets out that 'for the largest developments involving housing (typically those providing 100 homes or more), the Council may seek affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision'. This policy should be supported by evidence to ensure deliverability.	The Council is preparing a Topic Paper on Supported Housing to support the Plan at examination. This will include viability evidence to demonstrate that the Plans approach is deliverable.	Agreed. The Mayor notes that additional evidence to ensure deliverability is being prepared.
Affordable housing	Draft Policy H4(E7) states that the LBC will take into account the economics and financial viability of the development when considering whether affordable housing provision should be made on-site. This policy should be tested at plan making stage and viability assessments	Local Plan Policy H4 Part E.7 will not apply to schemes that satisfy the London Plan's viability thresholds, but will apply to all schemes that follow the Viability Tested Route.	Agreed. The Mayor considers the proposed modifications to paragraph 7.154 provide sufficient

should not generally be expected at application stage unless a scheme proposed a noncompliant level of planning obligations i.e. lower level of affordable housing, which is already covered in Part B of the same policy.

We consider that limiting discussion of viability in Policy H4 to the reference in Part B.4 to the London Plan's viability thresholds would make it very difficult to for third parties to understand the policy without also referring to the London Plan.

clarity about how proposals following the viability tested route will be considered.

To address the comments raised by the GLA the following modification is proposed to paragraph 7.154:

"For smaller development proposals that do not provide affordable housing in accordance with the sliding scale (set out in paragraph 7.116), and larger development proposals that do not meet the London Plan viability thresholds (set out in paragraph 7.120 of this Plan and Policy H5 of the London Plan 2021), In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability in negotiating the affordable housing contribution. including We will take account of the availability of public subsidy, particular costs associated with the development (such as restoration of heritage assets and remediation of contaminated land), and the distinctive viability characteristics of particular development sectors (such as build to rent housing). Subject to Where development proposals do not

		satisfy the relevant sliding scale target or the London Plan viability threshold approach, we will expect"	
Affordable housing	It is recommended that the policy wording within draft Policy H4(F) is clearer on what the triggers are for viability reviews. If the triggers are in line with the London Plan, then it is questioned whether it is necessary to replicate this policy within the draft Plan as the same London Plan policy already applies to all relevant development proposals.	The Local Plan does not seek to depart from the London Plan in relation to the triggers for viability reviews. This is confirmed in supporting paragraph 7.155. The Plan wording sought to find a suitable balance between a Local Plan policy that can be understood in its own right (without constant reference to the London Plan), and a policy which duplicates large parts of the London Plan.	Agreed.
Viability	LP2021 Policy DF1 identifies that affordable housing and necessary public transport improvements should be prioritised by decision makers when seeking planning obligations. There are a number of references within the policies and supporting text in the housing section of the local plan that refer to financial viability as a matter of consideration for development schemes. Whilst it is acknowledged that financial viability could be a material consideration, there is a concern that the references to such within the policy and supporting text could run counter and/or result in securing a lower level of planning obligations with applicants seeking to submit non-policy compliant schemes to justify the submission of viability information.	The references in the Local Plan to considering viability reflect the targets of the Local Plan in relation to affordable housing, but also in other areas such as climate change and affordable workspace. The Camden Local Plan Viability Study 2025 indicates that these targets will be deliverable in some circumstances but not in others, and supports the inclusion of references to viability in the Local Plan. As the Viability Study points out, the alternative approach would be for the Local Plan to set unambitious targets, allowing some schemes to deliver far less than they have potential to deliver.	Agreed.

With this in mind, it is recommended that
consideration is given to removing such
references with the view of ensuring that viability
testing is only used in a limited way as part of
the decision-making process and that most
applications would not be subject to protracted
viability discussions in relation to a wide range
of policy matters.

Regardless of any wording in the Local Plan, applicants may seek to justify submission of a viability assessment at the application stage - see for example NPPF paragraph 59 and planning practice guidance reference ID: 10-029-20190509.

Specialist Older Persons Housing (Policy H8)

Draft Policy H8 supports the development of, and resists the net loss of, specialised housing for older people, people experiencing homelessness and other people with care or support requirements. Whilst this is welcomed, the draft Plan should establish what the need is for specialist older persons housing. In the absence of a figure of need, LBC should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of LP2021. For LBC, this is for the delivery of 105 units a year. In accordance with Policy H13 of the LP2021 LBC should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing.

The Local Plan includes the Mayor's indicative benchmark figure of 105 additional homes per year in paragraph 7.258, which supports Local Plan Policy H8 Housing for older people, homeless people and other people with care or support requirements. As indicated in Local Plan Policy H8 Part B, and supporting paragraph 7.235, the Council's approach to people with care or support requirements (including older people) is to provide "floating" care and support and adaptations that enable them to live independently and safely in their own homes, whilst also acknowledging that a proportion will require suitable specialised housing. A summary of the anticipated need for specialised housing for older people provided on behalf of the Council is set out in Local Plan paragraphs 7.239 - 7.242, and we will seek to meet this through the application of Policy H8 Parts

Agreed. The Mayor notes that the LP2021 indicative benchmark figure for specialist older person's housing is included in paragraph 7.258, that paragraphs 7.239 to 7.242 set out the anticipated future needs for older people in Camden, and that a number of site allocations will support the development of a range of specialist older persons housing.

Gypsy and Traveller	Draft Policy H11 states LBC will aim to secure a sufficient supply of pitches/plots to meet the	D and F. We anticipate that the need for market provision will be met through the application of Policy H8 Parts E and F. The allocated use for two Site Allocations includes a specialist care home (Site Allocation W7 Gonder Gardens Reservoir and Site Allocation N2 Former Mansfield Bowling Club). The potential to include housing for older people or other people with care or support requirements is also identified in a number of allocations, and another site allocation identifies the potential inclusion of Extra Care housing. The Proposed Submission Draft Local Plan sets out the identified need for	Agreed subject to proposed
accommodation (Policy H11)	accommodation needs of Camden's established Traveller community over the Plan period to 2041. This is welcomed. The draft Plan identifies a need for 19 additional pitches over the Plan period. Two sites have been allocated within the draft Plan to provide the additional pitches required: S20 – York Way Deport and adjacent land at Freight Lane, and C27 Land adjacent to Constable House, Adelaide Road. It is anticipated that these sites could deliver a maximum of six pitches, and as such LBC is currently unable to meet their identified need over the Plan period.	Gypsy and Traveller accommodation across the Plan period. The Council did not include a ten year pitch target in the Plan as we are relying on the findings of the Londonwide GTANA, which were delayed. Given that we now have a final need figure, we intend to propose a modification to update Policy H11 Accommodation for Travellers to include the ten year pitch target. Furthermore, we also propose the following modifications to Policy H11 to	modifications to include 10 year pitch target in the plan, indicative capacity at allocated sites, support delivery of windfall sites, and updates to relevant supporting paragraphs. The Mayor acknowledges that
	Policy H14 of LP2021 states that a ten-year pitch target should be included within	ensure the Proposed Submission Draft Local Plan is in line with Policy H14 of the London Plan –	Camden is reliant on the findings of the London-wide

development plan documents. To be consistent with Policy H14 of the LP2021, LBC should clearly set out their ten-year pitch target and how they plan to meet those needs in full. The draft Plan should be updated to include this target and set out whether the two sites identified are able to fulfil the ten-year target or not. It is understood that LBC have written to other LPAs to ask whether they are able to meet the accommodation needs of Gypsies and Travellers. If LBC cannot meet their ten-year pitch requirement this would be a general conformity issue.

- 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:..."

Also, subsequent updates to the supporting text:

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

GTANA to inform the 10 year target, and that the publication of the GTANA has been significantly delayed. Publication is expected before the end of 2025 and this will confirm Camden's need over 10-years.

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)."

Insert two new paragraphs 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."	
		London Plan Policy H14 A states that boroughs should plan to meet the identified need for permanent pitches. Camden has planned to meet the identified need and has done all it reasonably can to find and allocate sufficient pitches - as set out in our Gypsy and Traveller Topic Paper. Therefore, we consider that the approach in the Local Plan is sound and in accordance with London Plan policy H14. The Council considers that this is a matter of soundness, rather than general conformity, which should be considered against the plan as a whole.	
Tall Buildings (Policy D2)	There are a number of viewing corridors which run through LBC that should be taken into consideration when planning for tall buildings. These are Primrose Hill summit to St Paul's Cathedral; Parliament Hill oak tree to Palace of Westminster; Parliament Hill summit to Palace of Westminster; Parliament Hill summit to St	The LVMF view corridors are included on the draft Policies Map. The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study, which took into account the guidance in the London Plan and the LVMF.	Agreed.

Paul's Cathedral; and Kenwood viewing gazebo to St Paul's Cathedral. Extensions of the Blackheath Point to St Paul's Cathedral and Greenwich Park Wolfe statue to Tower Bridge also fall within the borough. It is recommended that the LVMF view corridors are included within the Policies Map and local plan. When considering tall buildings in the locations affected by the views, the guidance in the London View Management Framework and Policy HC3 of LP2021 should be taken into consideration.

Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant policies. Policy D2 confirms that proposals for tall buildings will also be considered against the London Plan's tall buildings policy. Part C.9 of Policy D2 states that when considering an application for a tall building the Council will give particular attention to the relationship between the building and hills and views, ensuring that any proposal preserves protected strategic views.

Tall buildings

Draft Policy D2 sets out LBC's approach to tall building development within the borough. The draft Plan defines tall buildings as 40m within the CAZ and 30m elsewhere. This is in line with Policy D9 of the LP2021. Table 12 of the draft Plan details a number of sites in which tall buildings may be an appropriate form of development. It is 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.

Table 12 of the Plan sets out the locations where tall buildings may be an appropriate form of development, and provides information on the sites identified on Figure 22. Guidance on building heights for specific sites is then set out in the relevant site allocation policies. Given this, it is not considered necessary to also include this information in Table 12.

Agreed. The Mayor notes that the boundaries of the appropriate locations shown in Figure 22 are the same as the relevant site allocation boundaries and that the site allocations provide clarity on what heights may be acceptable.

Industrial land - Site Allocation C3	Camden is located within the Central Services Area (CSA) that supports the Central Activity Zone. There are no SIL sites located within LBC. The draft Plan identifies an 'Industry Area' within the borough, which is equivalent to LSIS. The LSIS site is subject to a site allocation (C3 – Murphy Site), identified to deliver 750 additional self-contained homes. The site allocation states that development at this site should be 'employment-led' and seek to 'intensify industrial provision to increase, or at least maintain, industrial storage and warehousing capacity'. The site allocation needs to be clearer in terms of the amount of industrial space that is envisaged at this site.	Policy C3 sets out the Council's overall development principles for the Muphy's site. It is not considered necessary or appropriate to set out a detailed quantum of particular uses on large mixed use development sites such as this. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Local Plan and the London Plan.	Agreed. The Mayor notes that in addition to the site allocation, Policy IE3 Part C relates to how site allocations will be expected to demonstrate that they have fully realised the potential for intensification.
Industrial land	Overall, the draft Plan identifies that there is just under 35ha of industrial land within LBC. The draft Plan does not identify the amount of industrial capacity that is required to be delivered over the Plan period. This should be provided and broken down so that is clear what the need is for Class B uses. It is noted that draft Policy IE3 sets out a 'manage and protect' approach to the supply of industrial and warehousing land within the borough, but this should be strengthened to ensure that sufficient supply is planned for to meet demand.	The Council does not consider it reasonable or practical to set a target for industrial space in the Local Plan given the highly constrained nature of the borough, the lack of sites to provide additional capacity, and the critical need for housing to meet identified needs. The Local Plan therefore focusses upon safeguarding and intensifying existing sites.	Agreed. The Mayor notes that paragraphs 9.47 and 9.48 reference the Camden Economic Needs Assessment (ENA) and its conclusion that in addition to the industrial sites allocated for intensification or development, remaining nondesignated industrial land

Waste site safeguarding	Within LBC's industrial land there is one waste management site, and one aggregates site. The waste management site is identified within the North Waste London Plan, with the aggregates site safeguarded through draft Policy S1(Q). The Regis Road site allocation includes LBC's waste management site. The site allocation is clear that the development must retain or reprovide the Regis Road Recycling Centre, unless suitable compensatory sites are provided elsewhere that replace the existing provision. It should be noted that if the waste site is identified as surplus capacity, it should in the first instance be offered to other LPAs within London who are unable to meet their apportionment requirements. It should be ensured that LSIS, waste sites and aggregate sites are clearly identified on the Policies Map.	Comment noted. Designated industrial areas and waste and aggregate sites are clearly identified on the Local Plan Policies Map.	should be protected. In Camden's context, Parts B and C of Policy IE3 are considered sufficient to appropriately safeguard industrial land and maximise opportunities for intensification. Agreed.
Office Development	The draft Plan sets out an estimate that circa 400,000sqm of floorspace will be provided for	The draft Local Plan supports proposals involving additional office floorspace and	Agreed.

	office and research development uses over the Plan period. Draft Policy IE2 seeks to manage and protect the stock of offices within the borough. The draft Plan contains site allocations seeking to provide office floorspace. Office floorspace should be directed towards the CAZ, town centres and Opportunity Areas.	the refurbishment of existing office stock within the Central Activities Zone, and steers office provision towards the Central Activities Zone and other centres commensurate with their size and function (Policy IE2 Offices and Paragraph 9.34). Policy S1 recognises that the Central Activities Zone (CAZ) and the Knowledge Quarter will continue to be the main focuses of employment development in Camden. Policy S2 - Euston Area expects development in the Opportunity Area to deliver employment floorspace, which will include offices. The Council's detailed approach to Euston is set out in the Euston Area Plan.	
Central Activities Zone	The south of Camden forms part of the Central Activities Zone (CAZ), as defined in Policy SD4 of the LP2021. Part N of Policy SD4 sets out that Development Plans should look to define the boundary in detail and include on policy maps. Policy SD5 states that new residential development should not compromise the strategic functions of the CAZ.	The Local Plan Policies Map shows the boundary of the CAZ in Camden. It is considered that the approach taken in the Local Plan aligns with Policy SD4 of the London Plan. Policy S1 - South Camden states that CAZ (and Knowledge Quarter) will continue to be the main focus of employment development in Camden (Part K). It supports the specialist clusters of activity in the CAZ (Part M), as well as the CAZ retail clusters and Specialist Shopping Areas (Part S). Policy H2 - Maximising the supply of self-contained	Agreed.

		housing from mixed-use schemes is applied taking into account any floorspace needed for particular Central Activities Zone (CAZ) activities, having regard to CAZ strategic functions and specialist clusters recognised by the London Plan, and designations in the Plan (Part C.4). Policies A1 - Amenity and A4 - Noise and vibration set out the Plan's approach to the agent of change principle.	
Camden Town station	The Camden Town station capacity upgrade remains a project of strategic importance given it is an essential enabling component of a future Northern line upgrade, which would allow more than the current 24 trains per hour. We therefore encourage LBC to carefully consider how the policies and site allocations in the plan could make the most efficient use of land to help deliver this upgrade alongside step-free access.	Policy C1 sets out the Council's key priorities for Central Camden, including the delivery of step-free access at and capacity upgrades at Camden Town Underground Station. Site Allocation C17 - Camden Town over station development sets out further criteria to guide the delivery of the site. Criterion 3 of Policy C17 states that development must ensure that a design-led approach is taken to delivering the optimum amount of development on the site.	Agreed.
Transport	LBC is encouraged to make clear in the draft Plan where and how bus infrastructure, including priority measures, will be enhanced to support the efficient operation of the bus network and improved journey times. Relevant site allocations should be more specific with infrastructure requirements to protect access to	Policy T3 sets out the Council's approach to public transport provision in the Camden, including bus infrastructure. Further requirements are also set out in the site allocation policies where relevant. More detailed guidance on this matter is provided in Camden Planning Guidance	Agreed.

	the bus network and enhance infrastructure as part of development and design principles, linked to achieving sustainable mode share targets.	on Transport. No additional wording in the Local Plan is therefore considered necessary.	
Safeguarding for transport infrastructure	LBC should make the safeguarding limits, including sites of surface interest, clear within the draft Plan. This includes within site allocations which are subject to Crossrail 2 safeguarding directions. Policy should clearly set out the process for safeguarded sites and how this might impact development within the relevant site allocations.	Local Plan Transport Safeguarding Areas, HS2 Phase 1 Safeguarding and HS2 Homeowner Protection Zones are designated on the Policies Map. Policy T1 Safe, Healthy and Sustainable Transport states that the Council will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure projects. Criteria are also included in relevant site allocations in the south area to ensure that Crossrail 2 infrastructure is incorporated into the overall design of scheme in a manner which responds positively to the public realm.	Agreed.

Signatures

Signed on behalf of London Borough of Camden

Brian O'Donnell

Strategic Lead - Planning Policy and Implementation

17 November 2025

Signed on behalf of the Greater London Authority



Karen Montgomerie

Strategic Planning Team Leader (Local Plans)

20 November 2025

Appendix 1 - Notes of duty to co-operate meetings between the London Borough of Camden and the Greater London Authority

Camden and GLA Duty to Co-operate Meeting 12 May 2021



No agenda – Purpose of the meeting was to discuss the draft Site Allocations Local Plan and general planning policy matters.

- Discussed approach taken to industrial land in the draft Site Allocations Local Plan.
- Discussed approach taken to the Central Activities Zone in the draft Site Allocations Local Plan.
- GLA confirmed their preference was for offices in the CAZ, rather than industrial
 uses.
- GLA stated that the London Plan does not support offices in industrial areas.
- Discussed the introduction of Use Class E and the implications of this.
- Discussed first homes and the implications. GLA confirmed they oppose first homes and their response to the consultation is on their website. GLA stated that they will support Camden in supporting provision of other low cost housing.
- Discussed Gypsy and Travellers accommodation. GLA confirmed that the London Plan now uses the national definition for Gypsies and Travellers and that a new London-wide needs assessment will be undertaken, although there are no dates for this yet.
- GLA stated that Camden should consider how they intend to meet the accommodation needs of Gypsies and Travellers through the draft Site Allocations Local Plan.
- Discussed student housing provision in London. GLA stated that UCL have said that the demand for places has started to increase.
- Discussed tall buildings. GLA stated that the draft Site Allocations Local Plan provided an opportunity to identify suitable sites for tall buildings in Camden and set out heights in accordance with the new London Plan policy.
- GLA advised that they have published draft SPDs on a range of topics.

Camden and GLA Duty to Co-operate Meeting 24 November 2022, 2 - 3pm

GLA -		
LBC -		

No agenda – Purpose of the meeting was to discuss the review of the Local Plan, including site allocations.

- LBC gave an update on the review of the Local Plan, which includes the site allocations that were previously in the draft Site Allocations Local Plan.
- Discussed how to approach setting the housing target in the Local Plan given that the Plan period will likely run to 2040/41 and the housing targets in the London Plan only go to 2028/29.
- Discussed the limited availability of land for housing in Camden.
- GLA acknowledged that some London boroughs can deliver a lot of housing, whereas its more difficult for others.
- GLA stated that they will shortly be commencing a new London-wide Strategic Housing Land Availability Assessment and recommended that Camden are involved in this.
- Discussed Camden's housing backlog and how this should be factored in when setting the housing target. GLA confirmed that Camden still needed to plan for the shortfall in housing delivery.
- Discussed the approach other boroughs are taking to setting their housing target, including rolling forward the London Plan housing target.
- GLA advised that the London Plan says that boroughs should draw on the SHLAA, gather other evidence and discuss approach with the GLA when looking at setting their housing target post London Plan. Borough's are not expected to just roll forward the housing target in the London Plan in their Local Plans.
- GLA advised that Camden should look at how we should optimise capacity on sites identified.
- Agreed there was no immediate solution to the issues Camden are facing in respect of housing delivery.
- Agreed to keep engaging about this issue.

Camden and GLA Duty to Co-operate Meeting 25 January 2023, 2 - 3pm

GLA -LBC -

No agenda. Purpose of the meeting was to discuss the draft new Camden Local Plan.

- Discussed the approach to meeting the accommodation needs of Gypsies and Travellers in the Camden Local Plan. GLA advised that Camden talk to Islington.
- Discussed housing land supply issues and the approach Camden are taking to setting the housing target in the Local Plan.
- Discussed potential for having a stepped housing target and agreed this could be a sensible approach.
- GLA advised when calculating the backlog in terms of housing delivery the start date for this should be 2019. Should aim to deliver whole London Plan housing target by 2028/29.
- GLA advised Camden to revisit the Londonwide SHLAA 2017.
- Discussed the approach to tall buildings and the Camden building heights study. Agreed it is appropriate to set out height ranges for sites in the Local Plan.

Camden and GLA Duty to Co-operate Meeting 23 February 2024, 2 - 3pm

GLA -LBC -

No agenda. Purpose of the meeting was to discuss the draft new Local Plan at Regulation 18 consultation stage and the GLA's likely response to this.

- Discussed the approach Camden has taken to setting the housing target in the draft new Local Plan.
- Discussed whether the GLA had a view on Camden including a large sites windfall allowance. GLA stated that this is not mentioned in the London Plan. It would be for the Inspector to take a view on.
- Discussed the approach to affordable housing set out in the draft new Local Plan and how it relates to the threshold approach set out in the London Plan.
- Camden explained how the Plan's approach to affordable housing works and why it is necessary in a Camden context.
- GLA advised that Camden should look to demonstrate what the policy approach delivers in terms of homes.
- GLA advised that they would like more clarity on how the affordable housing policy works with the threshold approach set out in the London Plan.
- GLA are open to taking a flexible approach, provided its evidenced.
- Discussed the approach to industrial land in the draft new Local Plan.
- GLA advised that they have concerns over loss of industrial land.
- Camden set out the approach taken in the site allocations to ensure no net loss of industrial land.
- GLA advised that it would be helpful to have a baseline of industrial land supply in Camden and then monitor any losses or gains.
- Discussed the approach taken to tall buildings in the draft new Local Plan. GLA confirmed they were happy with the approach taken.

Camden and GLA Duty to Co-operate Meeting 19 December 2024, 2 - 3pm

GLA -LBC -

No agenda. Purpose of the meeting was to discuss the draft Camden Local Plan and the next London Plan.

- GLA advised that they will be talking to boroughs about their likely new housing target next year.
- GLA advised that they are planning to hold an early consultation on policy options for the new London Plan in March 2025.
- Discussed the email the GLA sent to all boroughs dated 5 September 2024. which stated that in light of the proposed changes to the NPPF they would expect boroughs to roll forward the London Plan housing target until a new housing target is set through the London Plan.
- Discussed that the London Plan will be 5 years old in March 2026 and the implications of this for calculating a 5 year housing land supply / housing delivery test.
- GLA advised that they will publish a timetable for the review of the London Plan shortly.
- GLA advised that they are undertaking a complete review of the London Plan. It is likely to be a more strategic plan.
- Discussed the approach Camden has taken to setting the housing target in the new Local Plan.
- GLA advised that the housing target beyond the end of the London Plan housing target is not likely to be a general conformity issue.
- Discussed the approach to affordable housing set out in the draft new Local Plan and how it relates to the threshold approach set out in the London Plan.
- Camden agreed to provide further information to the GLA on this and have a further meeting in the new year to discuss the approach.
- Discussed the approach to meeting the accommodation needs of Gypsies and Travellers in the Local Plan. GLA advised that they will likely say Camden should be planning to meet the identified need for Gypsies and Travellers accommodation, but this is unlikely to be a general conformity issue.

Camden and GLA Duty to Co-operate Meeting 28 January 2025, 11 - 12pm

GLA -LBC -

No agenda. Purpose of the meeting was to discuss Camden's affordable housing policy.

- Discussed the rationale for using the sliding scale approach in the affordable housing policy
- Discussed the rationale for use of floorspace to consider the proportion of affordable housing
- Discussed the unintended consequences of using habitable rooms as a measure
- Discussed the rationale for use of net additional housing/ housing floorspace rather than gross housing/ housing floorspace
- Discussed the rationale for contributions (financial) from "non-major" sites
- Discussed what would be an appropriate threshold for a dovetail between the Camden approach and the London Plan approach
- Discussed the proposed wording of the Local Plan affordable housing policy
- GLA referred Camden to the Accelerating Housing Delivery Practice Note 2024
- GLA confirmed Camden's approach is unlikely to be a general conformity matter
- Agreed to supply the GLA with further information on our approach and to continue this dialogue

Camden and GLA Duty to Co-operate Meeting 10 February 2025, 3 - 4pm

GLA -LBC -

No agenda. Purpose of the meeting was to discuss Camden's affordable housing policy.

- Discussed whether the affordable housing target should be based on gross housing or net additional.
- Camden stated we would be prepared to work with gross as per the London Plan
 policy provided we can include a criterion to indicate that we will take account of
 any existing market or affordable housing on the site and its impact on the
 deliverability of the development (having regard to the borough's policies protecting
 existing housing and protecting existing affordable housing).
- GLA confirmed they would be okay with this approach.
- Discussed the use of floorspace over habitable rooms. Camden agreed to refer to both in the policy. GLA confirmed they were happy with this approach.
- Discussed the use of the sliding scale and the fast track trigger.
- GLA could not confirm what the threshold approach will look like in the next London Plan.
- Camden confirmed it would be prepared to terminate the sliding scale at capacity for 15 homes, taken as 1,500 sqm GIA, which would get to a 30% target, with the threshold approach (35% or 50%) applying to all larger schemes, on the basis that publicly-owned sites do not come forward often and will tend to be viability tested.
- GLA confirmed that this approach is acceptable and would unlikely result in a general conformity objection.

Camden and GLA Duty to Co-operate Meeting 6 June 2025, 3 - 4pm

GLA -LBC -

No agenda. Purpose of the meeting was to discuss the GLA's proposed response to the Camden Local Plan Proposed Submission Draft.

- GLA outlined their response to the consultation on the Camden Local Plan Proposed Submission Draft.
- GLA stated that they will raise a general conformity objection in relation to the housing target in the Local Plan.
- Camden explained the approach that we have taken to setting our housing target and that this includes the final three years of the London Plan housing target for the borough.
- GLA raised concerns about the approach to affordable housing in the Local Plan and how it aligns with the threshold approach in the London Plan.
- Camden explained the approach taken to affordable housing in the Local Plan and how it aligns with the London Plan.
- Camden confirmed that the proposed approach had previously been discussed and agreed with officers at the GLA.
- Camden explained it is trying to maximise housing delivery, not avoid provision.
- Discussed whether some of the issues raised by the GLA in relation to general conformity reflected the wording in the existing London Plan 2021.
- Also discussed Euston, offices, industrial land supply, central activities zone, and tall buildings. The GLA confirmed they did not have any substantive concerns in relation to these matters.
- GLA stated that they were currently going through the process of getting their comments signed off and would provide them shortly.

Camden and GLA Duty to Co-operate Meeting 4 September 2025, 4 - 5pm

GLA - LBC -

No agenda. Purpose of the meeting was to discuss Camden's response to the GLA's comments on the Camden Local Plan Proposed Submission Draft, and the Camden / GLA Statement of Common Ground.

- GLA want to support councils to get a sound plan.
- GLA want to reach agreement as far as possible through the Statement of Common Ground
- Discussed GLA's comments on conformity of the Local Plan with Para 0.0.12 of the London Plan and Camden's response to this.
- GLA asked if Camden could set out more clearly that they are using the London Plan target for first three years of the Plan period and are not trying to lower the London Plan target.
- GLA confirmed that this issue could be agreed through the Statement of Common Ground.
- Discussed GLA's comments on conformity of the Local Plan with Para 4.1.11 of the London Plan and Camden's response to this.
- The GLA asked if Camden could provide further information on the work that they
 have undertaken to inform the housing target in the Local Plan, so they can better
 understand Camden's approach. Camden agreed to provide the GLA with further
 information to evidence this.
- The GLA confirmed that this issue could be agreed through the Statement of Common Ground.
- Discussed GLA's comments on conformity of the Local Plan with Policy H14 Gypsy and Traveller Accommodation of the London Plan and Camden's response to this.
- The GLA confirmed that their Reg 19 response does not explicitly state the Local Plan is not in general conformity with the London Plan in relation to this.
- Camden agreed to provide the GLA with further information to evidence the work they have undertaken to plan for the accommodation needs of Gypsies and Travellers.
- The GLA confirmed that this issue could be agreed through the Statement of Common Ground.
- Camden stated that they are planning to prepare a General Conformity Topic Paper.
- The GLA stated they would prefer to deal with the issues raised in their Reg 19 response through a Statement of Common Ground.
- Agreed that the GLA would provide Camden with their Statement of Common Ground template for completion.
- GLA will then sign the Statement of Common Ground based on the additional information to be provided by Camden.