

Addendum to the Statement of Common Ground between the London Borough of Camden and Brent

November 2025

Introduction

This is an addendum to the Statement of Common Ground signed by the London Borough of Camden and London Borough of Brent on 4 September 2025.

In London, planning and co-operation on strategic matters, to be addressed through compliance with the duty to co-operate, are generally covered by the London Plan, with more locally specific matters covered in local plans. Camden and Brent both actively engage on 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.

Given this, it is considered that the main strategic matters to be addressed through the Duty to Cooperate for the London Borough Camden and the London Borough Brent are:

- housing need
- meeting the accommodation needs of Gypsies and Travellers
- tall buildings.

The London Borough of Camden has engaged with the London Borough of Brent 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. Appendix 1 sets out agendas and notes of duty to co-operate meetings held between the boroughs since 2018.

The London Borough of Brent 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 the two boroughs.

Signatures

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

LONDON BOROUGH OF CAMDEN

Name: Rebecca Burden

Position: Development Plans Manager

Signature: R. Burden

Date: 21 November 2025

LONDON BOROUGH OF BRENT

Name: Paul Lewin

Position: Spatial and Transportation Planning Manager

Signature: 

Date: 21 November 2025

Appendix 1 – Minutes of Duty to Co-operate meetings held between the London Borough of Camden and the London Borough of Brent

Duty to Cooperate Meeting - Brent, Camden and Westminster

16 May 2018

Agenda

1. Local plan updates
2. Statement of Common Ground
3. Presumption in favour of sustainable development
4. Waste apportionment
5. Lead Local Flood Authority
6. Neighbourhood Planning
7. Progress on Article 4 Directions
8. Approach to viability (both Plan viability and planning applications)
9. Consultation Statement responses
10. Any other outstanding cross-border strategic matters
11. AOB

Duty to Cooperate: Brent, Westminster and Camden 16/05/2018



1. Local plan updates

WESTMINSTER:

Went out to Reg 18 last June, we have been drafting policies with the intention of going out to Reg 19 consultation in November 2017. However, owing to publication of draft London Plan and national policy change announcements, we decided to delay Reg 19 until spring/summer 2018. Finalising policy wording now. However, we have just got a new cabinet member following the local elections.

CAMDEN:

Adopted local plan last summer, started updating site allocations and currently updating Camden Planning Guidance SPD's.

BRENT:

Another Reg 18 preferred options before Christmas. Earlier one in March summarising feedback and presenting to government member. Last plan adopted DM policies in 2016.

2. Statement of Common Ground

WESTMINSTER:

Westminster is likely to be the first borough out of the central London boroughs to go through examination following the introduction of the requirement for the statement of common ground. Probably best to do one for each of our neighbours individually rather than a group one. We will probably have a headline statement setting out what is covered by the London Plan, then individual items relevant to each individual borough. We will do a draft of this before submission stage. What issues would other boroughs like to see covered in the statement?

CAMDEN:

In favour of separate SoCG for each borough.

3. Presumption in favour of sustainable development

WESTMINSTER:

We would like to know if other boroughs have this policy in their plans and if not was this challenged by the inspector at examination?

CAMDEN:

Was an issue with the Fitzrovia action plan but not in the UDP. Did not appear in the main strategic policies.

BRENT:

Inspector did not bring this up.

4. Waste apportionment

WESTMINSTER:

How are other boroughs dealing with meeting their waste apportionment? We are updating our waste evidence base and are unlikely to be able to meet our apportionment in the London Plan. We will be contacting all of the boroughs where our waste is delivered to prior to submission.

CAMDEN:

Joint waste planning, joint apportionment. North London's waste ends up in many authorities, narrowed it down to authorities that take a reasonable amount. At Local Plan examination, no issues. The draft waste plan was consulted on over two years, so data study now happening. Apportionment is only for some waste streams. Includes, Islington, Haringey, Waltham Forest, Enfield, Hackney and Barnet and Camden.

Are objecting to apportionment in London Plan.

BRENT:

Adopted a few years ago, London plan impacts this – they are using old methodology at GLA

5. Lead Local Flood Authority

WESTMINSTER:

We would like to know how your authorities deal with getting advice on major applications which need to be referred to the Lead Local Flood Authority – do you have expertise in-house, or do you retain a consultant for advice?

CAMDEN:

Refer all applications to the Sustainability Team and receive comments including flood aspects from this team. They have general expertise.

BRENT:

Same situation, planning consults environment teams on flood related issues

6. Neighbourhood Planning

WESTMINSTER:

Knightsbridge and Mayfair submitted. Knightsbridge are currently going through examination. Both plans repeat a lot of our local plan policy. We have tried to discourage this. More plans expected to start coming forward.

CAMDEN:

Forums asked to send draft, and council advises on polices, rewording etc. Stay away from doing tracked changes. 3 made plans, 4th going to referendum in June and have approx. 4 draft plans coming forward.

BRENT:

Very similar to Camden, encourage to keep in contact and work through the plans, mostly been receptive to suggestions, repetition etc. Return a lot of comments, which has delayed a recent submission due to re-write. One adopted plan, Harlesden

about to draft, and Kilburn have gone quiet. Several more who are interested, one in Colindale. Stonebridge also, but having difficulties deciding their area. None have tried to set their own housing target.

7. Housing (i) housing and affordable housing targets, delivery and unmet need / housing delivery test (ii) affordable home ownership (iii) empty homes and short-term lets (iv) specialist provision, particularly students, compact living, older people, self-build.

WESTMINSTER:

Our housing target came down slightly following the SHLAA. We can meet our target. The standard methodology target will prove more challenging though. Self-build register, about 100 currently registered. We are looking into introducing a fee for registration and to remain on the register. Concerns about gathering robust data about self-build in Westminster as its not always immediately obvious that a development is self/custom build.

Affordable home ownership will be supported through new policy, although shared ownership tends not to work well here because of the cost of the shares. We are likely to have a policy to address shared living/other innovative housing models.

CAMDEN:

Numerical target is a slightly under 50% for affordable housing. Cannot meet housing need. A few have 35% without viability testing. Also have agreed from cabinet member that in principle, there is agreement with the Mayor's approach which will be reflected in SPD.

Affordable home ownership: effectively not possible in the borough. How can the market make it work? Doing slightly different version of London living rent, intermediate but without the ownership element.

Empty homes: political issue but no evidence to suggest it is a bigger issue in Camden than elsewhere - built to leave concerns.

Self-build: Not that many come forward for self-build, perhaps 30/40 per year, real figures around 14.

Compact living, not engaging.

BRENT:

50% target in DM policies, evidence to justify, taking on employment sites. Trying to fall in line with the Mayor's 35% through validation process but did not succeed. See what can be done in local plan review. Overall target hugely increased which is currently being met, particularly around Wembley. Should do well over the next 5 years. New methodology exploration for new sites assessment?

Affordable home ownership: Mostly shared ownership in private rented schemes, may have some discount market – ORS doing SHLAA.

Empty Homes – leader raised as issue. Little evidence. Only area where there may be is Wembley, foreign investors, but now the whole development is going towards private rental, unlikely it will become an issue.

Self build: A lot of claims on CIL for self-build – covers everything, flats converting etc. approx. 200 dwellings on small sites per year. No charge for registering, perhaps 60 on the list.

8. Progress on Article 4 Directions (B1a – C3)

WESTMINSTER:

Replacing temporary exemption from office to resi with an Article 4– consultation ended from B1 to C3, 2 objections only but nothing from MHCLG so will proceed.

BRENT:

Permission to confirm article 4 across growth and office to resi including B uses, this will come in 10 August if confirmed.

CAMDEN:

Consultation on renewing Article 4 underway.

9. Approach to viability (both Plan viability and planning applications)

WESTMINSTER:

Previously used RICS method and moving to EUV+ for planning applications. We will be commissioning BNP Paribas to undertake our plan viability assessment.

10. Consultation Statement responses (PINs requirements)

WESTMINSTER:

We've heard that Planning Inspectors have been asking for individual council responses to Reg 19 consultation responses rather than a response to grouped issues, which is contrary to what the regulations require. What has been your experience of this?

Camden:

Only one for submission version, earlier versions are just summaries.

Brent:

Latter stages getting reps in, more likely to be successful

11. Any other outstanding cross-border strategic matters

No issues.

WESTMINSTER:

Is dock-less cycling an issue in your boroughs?

Agreed yes (being left as obstructions on the highway or dumped in canals etc.) – but there is no way to enforce against them.

12. AOB

WESTMINSTER:

GDPR. We are reviewing our historic consultation responses, consultation database etc. to comply. Concerns about reducing the number of consultees on the list and the impact this will have on statutory consultation.

CAMDEN: Statement from RTP1 on GDPR. Option to delete old consultation when out of date. No reason to keep these.

BRENT:

Nothing actioned yet, no advice received.

Camden and Brent Duty to Co-operate Meeting

7 July 2021

Agenda

1. Update on Local Plans
2. London Plan
3. Planning reforms (Class E, PD, design codes etc)
4. Housing delivery and land supply
 - Gypsy and Travellers
 - First homes and affordable home ownership
 - Other specialist housing including self build
5. Neighbourhood Plans
6. Article 4 Directions
7. Any other cross border strategic matters
8. Updating the Statement of Common Ground

Brent - Camden Duty to Co-operate Meeting

7 July 2021 via Teams

[REDACTED]

[REDACTED]

1. Update on Local Plans

Brent

- Currently consulting on Proposed Mods following 3 week hearing. Hoping for report and adoption by Christmas.
- Mods include a tall building zone at Kilburn Square – to same height as existing tower – have adopted the GLA 30 metres threshold
- Needed this for a Statement of Conformity with London Plan, and to address Inspector comment. Were not allowed to introduce additional tall building sites as part of Proposed Mods
- Hoped for an overall new strategy, but this would have meant a new round of hearings.
- Inspector expected all London Plan Policy D9 steps to be followed
- SoS has called in a 21-storey TfL building at Wembley Park, which is in a draft allocation
- Not many reps and relatively few examination appearances - main participant was a neighbourhood forum who had a barrister
- Inspector made them set housing targets for neighbourhood areas (using London Plan small sites methodology).
- Preparing planning obligations, Neasden Growth area and other SPDs

Camden

- Consulted on Reg 18 Site Allocations prior to covid lockdown
- Reg 19 scheduled for Cabinet / Council in October.
- Need to pick up tall building issues – planning to work with existing Local Plan tall buildings approach. Will identify some sites but not height.
- Completed full review of all our Camden Planning Guidance SPDs, including housing, householder improvements, sustainability etc. - 20+ documents.

2. London Plan

- Picked up as part of other items

3. Planning reforms (Class E, PD, design codes etc)

- **Camden** - report on Article 4 Directions for class MA PD due for single Member decision on 16 July
- Doing the same as previous Article 4s for offices and light industry plus town and neighbourhood centres. Cabinet member keen for coverage to be as extensive as possible.
- Are not doing any current work on design codes currently
- **Brent** - going to cabinet on 19 July - proposing four Article 4 Directions including Site Allocation sites and town centres, ground floors only, not neighbourhood centres
- Have not done much characterisation work, looking to borrow approach from H&F, LB Ealing and LB Harrow, produce SPD and possibly Design Codes

4. Housing delivery and land supply

- **Camden** was initially over 100% on HDT, but has since dipped – now at 79%, so need Action Plan and 20% buffer on 5yr housing land supply, Do not have this, so now have the presumption in favour of sustainable development
- **Brent** are doing well on HDT – 120% last year
- Some slowing of delivery, but still delivering around double the target
- Have got more than a five year supply with healthy buffer, Inspector content with Housing Trajectory
- Finding it difficult to get appropriate developer evidence sought by NPPG to prove the position. Did not seek a statement from the Inspectorate.
- Brent are not able to meet any of Camden's unmet need.

Gypsy and Travellers

- **Brent** have not made allocations through Local Plan examination. It was helpful when London Plan position was changed. Current site is over-occupied - have taken management back in house. Engagement over increasing capacity (upwards pre-fab build), or seeking new sites. Local Plan has a criteria-based policy
- Had a study with W London which had need based on proposed London Plan definition and need based on DCLG definition. Taking the DCLG definition, need is nothing.
- **Camden** has a need for 16 pitches based on 2014 DCLG definition (now changed). Will commission new needs evidence in run up to submitting Site Allocations Local Plan

First homes and affordable home ownership

- **Brent** gets lots of shared ownership (exceeding their 30% guideline)
- Members are not keen on First Homes.
- Have just had a Pocket living over-turn taken to appeal

- **Camden** seeks intermediate rent, not shared ownership – shared ownership only works with small minimum equity purchase and limited rent on remainder
- Camden has opposed First Homes as inappropriate for London. Will bring forward a Planning Statement reaffirming existing affordable housing preferred mix and setting a minimum First Homes discount level of 50% - will make it more affordable.

Other specialist housing including self build

- **Brent** - Members have approved some compact living schemes recently (c 150 homes). Did have some concerns on quality and communal space re. Covid.
- Inspectors did not explore self-build at examination – Brent have a register but very little interest
- **Camden** has only two examples of compact living from over 10 years ago, c 120 homes
- Also only have a couple of people on a self-build register. Have not taken active steps to make sites available, but have a steady trickle of single dwellings seeking self-build CIL relief - typically half a dozen per year.

5. Neighbourhood Plans

- Kilburn Neighbourhood Forum have submitted an application to be redesignated. Will liaise and coordinate consultation
- **Camden** will be adopting 6th and 7th neighbourhood plans - Redington Froggnal and Camley Street - in the autumn, following recent referendums
- **Brent** - no further interest from anyone other than Kilburn at present
- Will need to resolve issue with Sudbury – who had a lot of internal political issues. Members have concerns with inclusivity and their constitution.

6. Article 4 Directions

- Class E addressed above
- Brent are seeking a HMO Article 4 to prevent C3 to C4 for whole borough except growth areas – aiming for September Cabinet
- Concern about poor quality, self-containment, and the loss of family dwellings in an area with large extended families.

7. Any other cross border strategic matters

- Camden and Brent are working together on Kilburn High Road project
- Liaising with town centre manager from Brent and on GLA funded project.

8. Updating the Statement of Common Ground

- Camden will update the existing SoCG before submitting Site Allocations Local Plan

Brent - Camden Duty to Co-operate Meeting

19 April 2023

Agenda

1. Update on Local Plans and Site Allocations
2. London Plan
3. Planning reforms (Class E, PD, design codes etc)
4. Housing delivery and land supply
 - Gypsy and Travellers
 - First homes and affordable home ownership
 - Other specialist housing including self build
5. Neighbourhood Plans
6. Article 4 Directions
7. Any other cross border strategic matters
8. Updating the Statement of Common Ground

Camden - Brent Duty to Co-operate Meeting Notes

19 April 2023

MS Teams

[REDACTED]

[REDACTED]

1. Update on Local Plans and Site Allocations

Brent Local Plan now adopted – examination generally went smoothly.

GLA declined to attend, though they were unhappy on building heights and industrial land.

London Plan was adopted during examination.

Site Allocations: no real external objections. Inspector had some concerns about inconsistency, no challenges on housing numbers, viability or infrastructure – housing numbers were simply indicative and not constraints. Put a very detailed caveat in re the indicative nature of the figures and relationship to other policies.

Brent have no big sites near Camden and none of Camden's emerging allocations are near Brent

Q - what were Brent's distinctions on level of detail for sites? – in retrospect, they would not have put so much detail in for sites delivering fewer than 100 homes.

Regen working on a masterplan for Staples Corner

Brent will be focusing on SPDs – Kilburn Sq has been scaled down and South Kilburn is some way off

Camden Site Allocations - had a second Reg 18 consultation. Now commencing new Local Plan, and will roll Site Allocations into it.

Also updating the Euston Local Plan

2. London Plan

Would be good to keep in touch GLA initiatives that create work that the boroughs cannot resource

3. Planning reforms (Class E, PD, design codes etc)

Discussed relevant planning reforms

4. Housing delivery and land supply

Brent housing delivery remains healthy – lots of student accommodation coming forward, can get on-site quickly. Some concerns about impact on affordable housing supply – some are modular buildings and can go from permission to completion in under a year

Some push back on proportion of students in Wembley, but will still be under 20%

Have ended up allowing for the whole area to be tall - had intended lower heights around the margins

GLA's character area studies are not seen as useful by DM and are expensive and time consuming – Brent would like to focus on areas of change

Brent beginning to worry about retrofit gaining increased weight and its inconsistency with the need to optimise development sites to meet housing need – but density increases they need on development sites simply couldn't be achieved from retrofit

Other specialist housing including self build

No concerns about Build to Rent – at Wembley, developer is providing BTR with conventional affordable housing

In larger schemes elsewhere some have pepperpot DMR, they are allocated offering a local connection test

Wembley Park is largely transient and one or two-beds, but there isn't any pushback

Compact-living - have got a couple of consents, not delivering yet – concerned about large-scale HMOs with little amenity

Gypsy and Travellers

No news – grappling with over-occupied site, occupants

First homes and affordable home ownership

Brent's own programme is stalling – some interest in CLTs, but main focus is on delivering social rent

5. Neighbourhood Plans

Brent have recently met Kilburn, seeking to agree a wording on design codes – expect plan consultation in summer - generally wording is not too bad

Brent have two competing Forums seeking designation at Sudbury Town

Harlesden seeking to extend its boundary

Some Forums in Camden are considering updating existing plans (notably Hampstead).

There is an emerging forum at Queen's Crescent – but no designation yet.

6. Article 4 Directions

Brent still trying to identify a more focussed area to protect Class E. DLUHC now starting to seem more conciliatory

Camden's class E article 4s were modified earlier in the year.

Reducing area to DLUHC's concerns has been a lot of work

7. Any other cross border strategic matters

Discussion on One Kilburn

Camden and Brent DTC

16 May 2024

Agenda

1. Update on Local Plans
2. Housing delivery and land supply
 - Meeting our housing needs
 - Gypsy and Travellers
 - First homes and affordable home ownership
 - Other specialist housing including self build
3. London Plan
4. Planning reforms
5. Neighbourhood Plans
6. Any other cross border strategic matters
7. Updating the Statement of Common Ground

Camden and Brent Duty to Co-operate - Notes of Meeting

16 May 2024 via Teams

1. Update on Local Plans

Camden

- Consulted on Reg 18 draft Local Plan earlier this year - considering the consultation responses and amendments.
- Aiming to submit before summer 2025 deadline.
- Also updating Euston Area Plan - similar timetable to Local Plan

Brent

- Are hoping to submit a Growth bid for funding the Local Plan update.
- Likely to wait for new London Plan housing targets before reviewing Local Plan.

2. Housing delivery and land supply

Meeting housing needs

- **Camden** are generally taking forward current Local Plan policies into new Plan.
- Plan provides an option for build to rent and student housing to provide standard affordable housing.
- Some responses were pushing for the Plan to be more positive towards co-living
- Meeting housing need is challenging particularly with uncertainty around Euston. Delivery there will be later than was envisaged.
- Camden is not rolling forward its London Plan housing target post 2029. Has set housing target in the Plan based on the guidance in the London Plan. Camden does not have new large sites to come forward beyond those previously identified.
- Camden cannot currently demonstrate a 5 year housing supply
- Under the duty to co-operate Camden will formally be asking neighbouring boroughs if they can assist in meeting housing need
- **Brent's** current Housing Delivery Test score is 144%
- But questions about future delivery as the number of major applications have reduced. Second staircases and rising costs have had an impact.

Gypsy and Travellers

- **Camden** commissioned consultants to do a site identification exercise. Emerging Londonwide evidence work indicates a need of 11 pitches over 10 years.
- Under the duty to co-operate Camden will formally be asking neighbouring boroughs if they can assist in meeting their need for gypsy and travellers accommodation.
- **Brent's** emerging target is over 43 pitches.
- Therefore, under the duty to co-operate they will also be formally asking neighbouring boroughs if they can assist in meeting their need for gypsy and travellers accommodation.

Specialist housing

- Camden have general policy on self build and have identified a site but there are objections to it
- Brent did not allocate sites in their plan but did not get objections so it was not an issue at examination. There are people on their self build register so may need to consider in plan review.
- Student housing is becoming a bigger issue in both boroughs - developers now want to build purpose built student housing rather than anything else.
- Allocated sites around Wembley are coming forward predominantly for student accommodation. Also, private rental properties is being let out students so there in issue for mixed and balanced community
- Camden's Local Plan has a priority for self-contained housing
- Brent's plan does not specify the housing should be self-contained so student housing is in line with the policy.

3 London Plan etc.

- More information on the review of the London Plan is likely to emerge now the mayoral election has taken place.
- Brent asked what Camden were doing about characterisation work. Camden has an existing characterisation study and has also done a Building Heights Study as evidence for the new Local Plan.

4 Planning reforms

- Relatively quiet at the moment
- Labour ideas on the 'grey belt' may have an impact in Brent.

5 Neighbourhood Plans

- Kilburn Neighbourhood Plan - Boroughs have been working together to advise the forum. Need to review latest email re Reg 14 responses.
- Looks likely they will submit the NP some time this year.
- Camden could not apply for NP grant when Kilburn NF were designated as already had passed forum limit.
- In Camden, Hampstead are working on an update to their NP.
- In Brent, Harlesden are looking to amend their area boundary. For Sudbury, a redesignation application was refused and a new forum came forward, which was approved. The new forum are to review the plan.

6 Any other cross border strategic matters

- Cricklewood town centre - mainly in Barnet. Lack of coordination between the boroughs was raised by Mapesbury Residents Association.
- Camden can discuss with Barnet at forthcoming meeting.

7 Statement of Common Ground

- Camden will produce an updated SoCG prior to examination and send to Brent.

LBC Euston Team and Brent Duty to Co-operate Meeting

17th July 2025 1pm - 2pm Via MS Teams

In attendance:

[REDACTED]

[REDACTED]

[REDACTED]

Agenda

- 1) Update on Euston Area Plan and context and history
- 2) Previous consultation
- 3) Changes to EAP strategies
- 4) Building Heights
- 5) Viability
- 6) Next steps

Camden presented an update on their work to date, noting the evolving and confidential nature of some of the inputs to the EAP, the presentation is summarised below.

Update on Euston Area Plan

- LBC recapped on the aims of the EAP and timeline of work since it was adopted in 2015.
- The update to the EAP is being developed alongside work by Lendlease, HS2 and Network Rail to consider how development can come forward in the context of a campus wide approach to Euston.
- Much of the development capacity is on land created by the redevelopment of the stations and tracks. In order to reduce costs and complexity, HS2 Ltd. are seeking to reduce the amount of decking providing resulting in less developable land available particularly for residential development.

Previous consultation

- Reminder of previous consultations took place in 2023 (Regulation 18) and a supplementary “direction of travel” consultation took place in 2024 following Government announcements about Euston and a pause in updating the EAP while awaiting the outcome of the reset to work

Changes to EAP strategies

- Camden presented the updated work in progress illustrative diagrams for Principle Strategies and character areas. There is a greater focus on Knowledge economy uses and the amount of homes has reduced due to less enabled land.

Building Heights

- Camden presented where additional height may go and the impact on LVMF and local views. The definition of a tall building has been updated in line with the Local Plan (40 metres in CAZ and 30 metres elsewhere) and additional locations identified for tall buildings including locations on Euston Road.

Viability

- Camden set out that the viability assessment concentrates on the station where there are extraordinary costs, relying on Local Plan assessment for non-station sites.

Next steps

- Cabinet decision on submission draft programmed for November 2025 with Reg 19 submission draft consultation in December 2025
- Will update Statement of Common Ground as necessary
- Camden offered another meeting if needed.
- Brent are interested in terms of connectivity of Euston with Old Oak but overall are not concerned about the impact on the Borough.

Notes shared following the meeting summarised briefly the strategic and non-strategic issues discussed. The strategic issues discussed were - the connectivity with Old Oak Common and Brent confirmed that they are supportive of development at Euston which would help to create value at Old Oak Common

Camden and Brent DTC

4 August 2025 10.30 am

Agenda

1. Update on Local Plans
2. Housing delivery and land supply - Duty to cooperate request
Meeting our housing needs
Gypsy and Travellers
First homes and affordable home ownership
Other specialist housing including self build
3. London Plan
4. Planning reforms
5. Neighbourhood Plans
Kilburn Neighbourhood Plan update
6. Strategic Infrastructure requirements
7. Any other cross border strategic matters
8. Updating the Statement of Common Ground
9. Any other business

Duty to Co-operate meeting - Camden and Brent 4 August 2025

Attendees:



Update on Local Plans

- **Camden** - Reg 19 consultation closed in June. Going through responses received. Most responses on a Gypsy and Travellers site. Aiming to submit in the autumn.
- Euston Area Plan - Euston Team met Brent about it last week
- **Brent** - likely to start review next year - will go through on new system. Legislative changes, new London Plan and NDMPs are causing uncertainty
- Members want plan to be updated on betting shops, adult gaming centres, student housing.
- Need to secure funds for the review - exploring CIL

Housing

- Brent have consents but not delivery, which has slowed down in recent years.
- Large sites have been mothballed. Also issue with viability of Brent's own schemes.
- Camden delivery last year was relatively good compared to previous years, but developers are looking to reduce affordable housing in consented schemes.
- Camden sent a duty to cooperate letter to all boroughs regarding 5 year land supply and Gypsy and Travellers accommodation needs. Will cover in updated Statement of Common Ground.
- Camden have allocated two sites for Gypsy and Travellers accommodation in Reg 19 Local Plan.
- Brent have identified need due to over-occupation on existing site. Are doing site identification work with 3 Dragons. Intend to submit planning applications rather than allocate in their local plan.
- Intermediate housing in Brent is mostly shared ownership
- Camden has a lot of interest in student provision. This is providing affordable C3 housing rather than affordable student accommodation.
- Brent are concerned about impact of student housing on mixed and balanced communities, especially at Wembley growth area. Intend to publish a planning position statement that will reduce developer appetite to promote PBSA in Wembley growth area as concentration is starting to be at the limit of what is acceptable in the short term due to limited conventional housing development coming forward which would act in balancing the population. Levels of concentration elsewhere do not currently justify a position that would highlight concerns.
- Co-living – interest in both boroughs but not being delivered.

London Plan

- Both boroughs responded to Towards a New London Plan.

Planning reforms

- NDMP are being delayed again.

Neighbourhood Plans

- Kilburn Neighbourhood Plan examination has started and the Examiner has sent questions. Boroughs will likely need to assist the forum in the response.
- Camden have adopted an updated Hampstead Neighbourhood Plan.
- Brent - New group for the Sudbury area. Harlesden NF have talked about reviewing their plan but have not progressed.

Strategic Infrastructure requirements

- Kilburn High Road – public realm and CCTV

Any other cross border strategic matters

- Brent Members are concerned about gambling establishments. Difficult to resist adult gaming centres under planning or licensing.

Statement of Common Ground

- Camden will send an updated SoCG in September

Any other business

- None