

# **Addendum to the Statement of Common Ground between the London Borough of Camden and Westminster City Council**

**November 2025**

## **Introduction**

This is an addendum to the Statement of Common Ground signed by the London Borough of Camden and Westminster City Council on 12 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 Westminster 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 Westminster City Council are:

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

The London Borough of Camden has engaged with Westminster City Council 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 2019.

Westminster City Council 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 Borough of Camden and Westminster City Council. 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: 27 November 2025

**WESTMINSTER CITY COUNCIL**

Name: Kimberley West

Position: Head of Planning Policy

Signature: *Kimberley West*

Date: 27<sup>th</sup> November 2025

## **Appendix 1 – Minutes of Duty to Co-operate meetings held between the London Borough of Camden and Westminster City Council**

### **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

### Local plan updates

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#### **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, starting 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.

### Statement of Common Ground

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#### **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.

Presumption in favour of sustainable development

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**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.

Waste apportionment

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**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

#### Lead Local Flood Authority

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##### **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

#### Neighbourhood Planning

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##### **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 policies, rewording etc. Stay away from doing tracked changes. 3 made plans, 4<sup>th</sup> 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. Stowe Bridge [?] also, but having difficulties deciding their area. None have tried to set their own housing target.

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.

#### Progress on Article 4 Directions (B1a – C3)

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##### **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.

#### Approach to viability (both Plan viability and planning applications)

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##### **WESTMINSTER:**

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

#### Consultation Statement responses (PINs requirements)

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##### **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

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.

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 RTPi on GDPR. Option to delete old consultation when out of date. No reason to keep these.

**BRENT:**

Nothing actioned yet, no advice received.

## **Westminster - Camden Duty to Co-operate meeting**

**13 December 2018**

### **Agenda**

1. Westminster City Plan 2040 timescales / progress
2. Statement of common ground
3. Update from Camden
4. Strategic issues
  - Housing Target / Growth
  - West End, Tottenham Court Road and Soho
  - Gypsies and travellers
  - Waste
  - Green Infrastructure
5. Neighbourhood planning
6. London Plan
7. Article 4s
8. CIL
9. District Heating – existing or planned
10. AOB

# MINUTES

## DTC Camden / WCC

<b>Date</b>	13 December 2018
<b>Time</b>	15:00 – 16:30
	[REDACTED]
<b>Apologies</b>	[REDACTED]
	[REDACTED]
<b>Location</b>	Room 2.3

1. Westminster City Plan 2040 timescales / progress  
Currently undergoing informal consultation until Dec 21<sup>st</sup> before reg 19 January/ February next year. Aiming to adopt late 2019 / early 2020.  
<https://www.westminster.gov.uk/cityplan2040>
2. Statement of common ground  
WCC planning to create separate statements for each borough. Preferably all to be signed before reg 19.  
Camden's sign off process likely to need member involvement.  
WCC to send draft statement ASAP. Strategic issues to include: Housing, Tottenham Court Road OA, Waste, Green Infrastructure
3. Update from Camden  
Local Plan was adopted in summer 2017. Currently working on a more detailed Site Allocations Plan. Reg 18 to begin summer 2019, Reg 19 by Spring 2020. To include development parameters for individual sites alongside infrastructure needs. Also updating all SPDs
4. Strategic issues

i. Housing Target / Growth

WCC higher housing target (1,495) per year derived from Government methodology rather than London Plan targets. WCC confirmed SHMA work and viability testing currently being finalised. Will be published at Reg 19.

WCC consider that the target can be met, there is a 5-year land supply and more permissive policies to deliver ambitious windfall assumptions after 5 years. WCC also considers that the Housing Delivery Test will be met, at least in the short term.

Discussion on WCC's proposed trajectory and role of windfall and the inclusion of vacant properties. WCC producing additional evidence to support the assumptions made in the trajectory.

Camden housing targets are aligned with the draft London Plan.

Camden considers that there is a 5 year supply of deliverable sites and a supply of developable sites for the remainder of the Plan period. Camden has been meeting its local plan target but is concerned that the Housing Delivery Test result may be below 85%, depending on the methodology, leading to a 20% buffer on the annual housing target and a greater challenge to demonstrate a 5-year land supply.

WCC has set an affordable housing policy target of 35%, split 60% intermediate and 40% social rent. WCC anticipate that intermediate housing could include affordable rent. WCC has not identified a preferred affordable home ownership model, but welcomes innovation. WCC has not yet produced an estimate of overall affordable housing need, but accepts that some households will move out of the borough to access lower cost housing.

Camden has a 50% affordable housing target for larger sites (capacity for 25 or more additional homes), split 40% intermediate and 60% social-affordable rent. Camden anticipate that intermediate will be a rented product as high capital values in the borough mean shared ownership does not work with incomes significantly below £90,000. Based on estimated delivery, Camden has a target of 5,300 additional affordable homes over 15 years, compared with a need for 10,000.

Action being taken to address vacancies as part of housing supply was discussed. Both authorities have policies to encourage bringing vacant policies back into use.

WCC does not address self-build in the plan. Camden Local Plan encourages the inclusion of self-build on large sites (0.5 ha+).

Camden has recently introduced a two-part self-build register with local eligibility conditions.

WCC protects and encourages student housing for HE institutions in Westminster, and follows the London Plan on affordability.

Camden has a similar policy, but providing for publicly-funded HE institutions in Camden and adjoining boroughs. Camden do not include language schools within their classification of higher education for purposes of student housing requirements.

WCC has also introduced a policy encouraging innovative forms of housing – which could include compact living with shared facilities. London office policy review base for WCC employment growth policies. Office space is being intensified and floorspaces do not always align with employment figures.

ii. West End, Tottenham Court Road and Soho

WCC sees TCR OA as part of the West End, the aim is for commercial-led intensification and public realm improvement. The policy in WCC City Plan adopts a proportion of the London Plan homes and jobs targets. There are no area-specific design policies, most sites already have permission. Camden has similar policies for the OA. Further collaboration on green infrastructure needs/proposals in this area would be helpful in future.

Soho policy does not currently contain any reference to protecting LGBTQ venues. Camden's pub protection policy contains an explicit reference to protecting them. WCC to consider inclusion.

iii. Gypsies and travellers

WCC do not have an identified need in the London Plan for sites/pitches. Not planning to explore need through SHMA work. Camden have an identified need, are likely to pursue options through DTC as site availability very limited, Camden note that development plan examinations may have regard to 2011 Census, which indicates the number of households or Irish Travellers and Roma Gypsies by local authority area.

iv. Waste

WCC confirmed that it cannot meet its London Plan apportionment. Current arrangements with other boroughs likely to be rolled forward.

Reg 19 plan to be accompanied by evidence of lack of sites within the city

v. Green Infrastructure

GI to be considered as a strategic issue given open space deficiency across Camden-Westminster boundary, particularly around TCR. Boroughs to consider how to cooperate further on this issue.

WCC identifies deficiency areas based on space to population ratios – GIGL data.

5. Neighbourhood planning

Camden have four adopted plans; WCC one. Camden could have three examinations next year. Similar number in WCC but dependent on whether NFs want to align with new City Plan.

WCC have not included housing targets for neighbourhood areas due to how much development is through windfall.

6. London Plan

Camden will be attending EiP, mostly on housing / mixed use issues. Also querying why some OA numbers went up

7. Article 4s

Camden have a confirmed Article 4 Direction for the CAZ, coming into force once the current CAZ exemption ends. WCC in a similar position. Camden also have an Article 4 covering specific office sites in the rest of the borough; CLG do not support area-wide ones.

Camden also have a variety of other Article 4s covering matters that have become PD – e.g. basements, retail, launderettes etc.

8. CIL

Camden working on a partial review of charging schedule to align with development pipeline. WCC unlikely to review CS until after City Plan is examined.

9. District Heating – existing or planned

WCC have one facility in Pimlico – interested to know if any opportunities in other boroughs for developments to connect. Camden Local Plan has a map showing existing and planned for facilities – Sustainability team doing more work on this. Due to the decarbonisation of the national grid the carbon benefit of gas fired CHP is expected end in c15 years.

10. AOB

Parking – WCC policies now resist commercial parking growth and provide for car-free in areas of parking stress, but generally allow 0.5 spaces per home (up to 2 beds) and 1 space for larger homes. WCC have also introduced more encouragement for cycling and walking. Camden's approach is to seek car free development boroughwide.

WCC will publish a draft IDP alongside Reg 19 consultation. Camden IDP work likely to involve DTC consultations with surrounding boroughs in the new year.

## **Westminster Camden Duty to Co-operate meeting**

**17 March 2021**

### **Agenda**

1. Update on Local Plans including 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

## **Westminster and Camden Council Duty to Cooperate Meeting**

**17th March 2021 via Teams**

**Attendees –** [REDACTED]

### **1. Update on Local Plans including Site Allocations**

#### **Westminster -**

Local Plan has undergone examination. Have consulted on main mods and hoping to adopt soon. [NB Inspectors report has been issued since the meeting and is published on the WCC website – aim to formally adopt plan at end of April]

Specific issues raised in the examination included:

Class E introduced a few weeks before hearings started. Amended policy and sounded out the Inspector on including reference to restrictive conditions but the Inspectors did not think this appropriate as against the spirit of the government's intentions.

Covid impact on evidence base was challenged. Inspectors accepted that it is too early to tell what the impact of the pandemic will be and current situation should not change a plan that covers a 20 year period.

Was some delay in spring 2020 as Inspectors requested for additional evidence on housing delivery. Have changed to using the London Plan target (was previously a higher target).

#### **Site allocations**

Work has now started on scoping first ever Site Allocations Plan. Asked Camden about what studies they had undertaken for their site allocations. Growth areas are identified in the Local Plan, rather than the site allocations plan. Camden is also preparing a number of Area Framework SPDs for the growth areas, providing additional detail.

#### **Other SPD**

Once the Local Plan is adopted Westminster will be preparing SPDs which will include:

- New environment SPD
- Affordable housing and planning obligations
- Design
- Heritage
- Public realm
- Oxford Street

## **Camden -**

Local Plan adopted 2017 so starting to think about review but main current work is Site Allocations Local Plan (SALP).

Reg 18 undertaken Feb March 2020. Put on hold to consider impact of planning reform changes and now looking to publish in late summer.

Have completely updated all SPDs for consistency with the Local Plan – Camden Planning Guidance documents. Recent significant changes include environmental updates, home Improvements and updated payment in lieu figures for affordable housing. Further review of environment SPD likely.

### **2. London Plan**

Publication of new London plan is helpful to the Camden SALP in relation to industrial sites.

Allows Westminster Inspector to issue report of examination.

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

New Article 4s could involve a lot of work – Class E to residential

WCC - concerned about reform of Article 4s. National significance should not be the only qualifier. Some additional guidance on scope could be helpful. Not all parts of the CAZ have the same significance. Transitional arrangements are important.

Camden – keen also to protect areas beyond CAZ and on transitional arrangements

Both keen to have property sector and BIDs on board

WCC consider preparing design codes will be expensive and lengthy, whole authority codes will not work there. WCC met NFs who were sceptical about neighbourhood design codes. They are concerned about skill and resource requirements, and do not think it will make development process easier.

LBC applied to be a design code pilot but were not chosen. Resourcing is an issue. NFs have given the same reaction as those in WCC. One of Camden's neighbourhood forums did commission a design code.

### **4. Housing delivery and land supply**

LBC had to prepare an action plan last year under the Housing Delivery Test and need a 20% buffer this year. Problem with housing sites being used for other things, particularly med-tech in the Knowledge Quarter.

WCC have to do an action plan this year.

WCC think that their site allocations will bring forward lots of housing sites – but will be a tension between height and housing numbers

## **Gypsy and Travellers**

This did not come up as an issue at the WCC local plan examination – relying on London Plan.

Camden has an identified need for 16 pitches.

## **First homes and affordable home ownership**

First Homes discount does not work in Westminster. Favour LLR, and also a range of intermediate rents to cover income range. Will be setting this out in SPD.

LBC have a similar approach on blending intermediate rents.

## **Other specialist housing including self-build**

WCC – plan has an innovative models policy.

Student housing was debated in examination hearings. They sought to limit to universities with a WCC base. Inspector said this was contrary to London Plan.

WCC encourage housing for older people with targets, and affordable requirement in line with general affordable housing policy. There is an issue with only high end housing coming forward for older people.

## **5. Neighbourhood Plans**

Camden have sixth and seventh NPs coming to referendum (Camley St/ Redington Frogna), but no other plans on the horizon.

Planning reforms may have dampened appetite for neighbourhood planning as plans can have less influence.

WCC thinks some NPs may progress their plans now City Plan is adopted.

Fitz West and Soho have been through examination and examination on Queens Park has recently started. FitzWest Examiners report has since been received; waiting for Soho report.

## **6. Article 4 Directions**

See discussion above

## **7. Any other cross border strategic matters**

Westminster asked about the Tottenham Court Road Growth Area. The main developments in Camden have happened - Centre Point and St Giles / Denmark St – nothing of note to the north.

Both WCC and LBC propose to rely on GLA for town centre health checks for the time being and will engage with the GLA as they develop

## **8. Updating the Statement of Common Ground**

Will need a SOCG when Camden submit their SALP. Agreed a new bi-lateral Statement was best approach.

## **9. Any other business**

Westminster raised future evidence post Covid on commercial need. The GLA are updating some evidence studies, but not offices as think it is too soon.

Difficult to know the direction on several issues, e.g. retail with Class E. Camden will look at these when they review their Local Plan.



City of Westminster

## AGENDA

### Duty to Co-operate Meeting

<b>Date</b>	11 <sup>th</sup> September 2023
<b>Time</b>	11am
<b>Location</b>	Teams

#### Agenda Items

1. WCC Local Plan updates (evidence/direction of policies)
2. Camden update
3. Duty to Co-operate Statement initial thoughts
4. LURB Consultation
5. AOB

# Westminster - Camden

## Duty to Co-operate Meeting

**Date** - 11 September 2023

**Time** - 11am

**Location** – Teams

### Attendees

[REDACTED]

### 1. WCC Local Plan updates (evidence/direction of policies)

WCC doing partial review with consultation on Reg 18 draft last year. 3 key strands as below.

#### a. Affordable housing / housing

More aligned with LBC on tenure split (subject to evidence). Higher priority to AH, on-site delivery, potentially small site contributions. May include something about difficulties of shared ownership and First Homes. May also consider conventional affordable homes from PRS and student housing.

Gypsies and Traveller requirements have always been zero.

#### b. Retrofitting

Moving to "retrofit first" (but not retrofit only). Need to take account of the M&S decision.

#### c. Site Allocations – St Mary's Hospital

Only proposing a limited number of site allocations. Prioritising where they think policy can help to unlock the site. Nothing very close to Camden. St Mary's is at Paddington. Want to assist delivery of a replacement fit-for-purpose hospital, which is likely to involve new buildings.

#### d. Timescales and next steps

Reg 19 anticipated for early 2024.

### 2. Camden update

LBC doing a full update of the local plan. Have previously consulted on site allocations local plan - allocations will now be part of whole plan review.

Have had a call for views and evidence is commissioned.

Key issues:

- climate change policies
- site allocations on a place-based approach – this is not design-code based approach
- economy and retail will come together as inclusive economy, affordable workspace
- family friendliness and planning for future generations, meaning of good growth
- balance between housing targets and commercial requirements
- make sure tall buildings approach is consistent with London Plan

Reg 18 Draft consultation expected to take place in early 2024.

Euston Area Plan Reg 18 was published at the start of 2023, currently paused – would hope to proceed under transitional arrangements

### **3. Duty to Co-operate Statement initial thoughts**

WCC will draft something. Also happy to share draft policies. A SoCG was signed in 2021, which can be updated.

### **4. LURB Consultation**

Boroughs are likely to respond pointing out issues with the proposals.

Proposals are very short on detail on national DM policies, and how supplementary plans would work

### **5. AOB**

Neighbourhood Planning – Camden expect a Reg 14 draft Kilburn NP soon.

Belgravia currently most active in WCC

## **Camden and Westminster Duty to Co-operate**

**20 June 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 Westminster - Notes of Meeting

## 20 June 2024

### Update on Local Plans

- Camden consulted on Reg 18 draft Local Plan earlier this year - considering the consultation responses and amendments.
- Aiming to take to Cabinet in the Autumn and submit before summer 2025 deadline.
- Also updating Euston Area Plan - intending to carry out further Reg 18 engagement in the summer to reflect changing circumstances and uncertainties. Currently working to similar timetable to Local Plan.
- Objections received to draft Camden Local Plan policy on mixed use.
- Westminster's mixed use policy was taken out of their plan by the Inspector at last examination. They did not agree that the policy approach was justifiable in the CAZ.
- Westminster are carrying out a partial plan review – focus on affordable housing, retrofit first and four site allocations. Reg 19 consultation closed in May.
- Retrofit policy received the most objections. Have evidence to support approach but are updating post consultation. Topic paper on retrofitting attracted a lot of comments.
- Hoping to submit in November - boroughs will need to update Statement of Common Ground before this.

### Housing delivery and land supply

#### *Meeting housing needs*

- Camden are setting a capacity-based housing target - first three years will reflect the London Plan target but are not rolling it forward beyond that. Proposed target is lower than the London Plan figure, reflecting capacity not need
- Cannot meet housing need so under the duty to co-operate Camden will formally be asking neighbouring boroughs if they can assist in meeting housing need
- This will also ask whether they can assist in meeting needs for gypsy and traveller accommodation.

#### *Gypsy and Travellers*

- Camden's emerging need figure in GLA study is similar to previous 2014 study.
- Westminster have an identified need for the first time. This is not part of the current partial plan review.

### ***Intermediate housing***

- Westminster want intermediate housing affordable to people on lower incomes more than shared ownership although detail is in their recently adopted SPD rather than being in the Local Plan.

### ***Other specialist housing including self build and first homes***

- Westminster have few people on their register.
- There have been no applications for first homes in either borough

### **Neighbourhood Plans**

- Westminster have 3 forums with plans moving towards submission but they are not close to the borough boundary.
- Knightsbridge are interested in updating their plan but have not made progress to date.
- Camden - Kilburn NF should be submitting a plan shortly.
- Hampstead NP is being amended and should also be submitted soon. It is not clear whether a referendum will be needed - depends on whether amendments are considered to change the nature of the plan.

### **Updating the Statement of Common Ground**

- Have a recent Statement of Common Ground but it will need updating, e.g. to reflect duty to co-operate housing requests and include text on Euston
- Camden will send suggested amended wording in due course.

## **Camden and Westminster Duty to Co-operate Meeting**

**Agenda – 17 July 2025**



### **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 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.
- Westminster to confirm with Heritage and Design colleagues about impact of development. Camden to provide 3D image of views and a comparison of 2023 EAP draft versus 2025 draft.

## **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.
- Camden confirmed that the Viability Report is high level (given the uncertainty and level of information that is currently available) and does not assess housing types.

## **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
- Westminster requested further information on how the current proposals relate to the 2023 draft.

Notes shared following the meeting summarised briefly the strategic and non-strategic issues discussed. The strategic issues discussed were - Strategic Views - Westminster CC requested to see further images of views, showing 2023 updates in comparison to the 2025 Update.

## **Camden and Westminster**

**3 September 2025 2pm**

### **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
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 Westminster

## 3 September 2025

### Attendees:



### Update on Local Plans

#### Camden

- Reg 19 consultation closed in June. Aiming to submit in October, with examination hearings in the new year. The largest number of comments was on an allocation for a Travellers site.
- Have capacity based housing figure beyond current the London Plan target period. The GLA have raised a general conformity objection. Camden considers it is a soundness matter not a conformity issue.
- Objections from the basement industry.

#### Westminster

- Doing a partial review on retrofit, affordable housing and four site allocations. Hearings were in late April to early May 2025.
- Consultation on main mods has just closed. Aiming to adopt later early next year.
- Affordable housing policy change, so portfolio approach to public land development only applied within Westminster, was not accepted.
- Commencing a non-statutory scoping phase to inform the upcoming full review of the City Plan with all policy areas in scope.
- Intention to produce of Direction of Travel document, which will not be undergoing consultation, however, will be published in early 2026.
- Next plan will likely be under the new local plan system dependent on the new Regulations coming into force.

#### Housing

- Camden are using the existing London Plan target for the first 3 years of the local plan. Then capacity based target.
- Camden does not have a 5 year land supply. Have written to all adjoining boroughs under the duty to co-operate to help address the shortfall.
- Westminster are mainly seeing commercial developments rather than residential.
- Westminster partial review changes the tenure split in affordable housing to favour social housing rather than intermediate.
- Camden is seeing a lot of student housing and co-living applications.
- PBSA is coming forward with conventional affordable housing rather than affordable student housing.
- Westminster are not getting that many student schemes.

#### Gypsy and Traveller accommodation

- Camden Draft Local Plan uses need figure from emerging London wide needs assessment.
- Aecom did a site identification study, focusing on council owned land.

- Two sites are identified in the draft Local Plan. As this does not meet needs in full Camden has written to other boroughs under the Duty to Co-operate.
- The draft London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) has identified a need for pitches in Westminster. Previously, no need was identified.

### **London Plan**

- No matters raised

### **Planning reforms**

- No matters raised

### **Neighbourhood Planning**

#### **Camden**

- Kilburn Neighbourhood Plan is at examination, hoping to adopt early next year.
- An update to the Hampstead NP has been adopted. Examiner found that no referendum was required as the update did not change the nature of the plan.
- Fitzrovia East Area – recent contact from residents about possibly setting up a Neighbourhood Forum.
- Working with our Equalities Team to encourage forums to be more inclusive and representative.

#### **Westminster**

- Knightsbridge enquiring about possible update to their adopted plan.
- Two recent examinations Maida Hill and Victoria. Referendums are expected late this year or early next year.
- Have a lot of applications for Forum re-designations.
- Have introduced new representative requirements for Forums which need to be demonstrated as part of their re-designation application package.

### **Strategic Infrastructure requirements**

- No matters raised

### **Any other cross border strategic matters**

- Mayoral Development Corporation for the Oxford Street Area extends across the borough boundary. Powers begin in April 2026, which will be during the Camden local plan examination.
- Tottenham Court Road opportunity area – Camden have not identified it as a growth area in the new local plan as it is mainly built out.
- Towards a New London Plan suggests it is removed from the next London Plan.

### **Updating the Statement of Common Ground**

- Camden will send an updated Statement for agreement - want it signed off in next couple of weeks.
- Will be a separate Statement for the Euston Area Plan.