

**Statement of Common Ground
between the London Borough of
Camden and Natural England
concerning the Camden Local
Plan Proposed Submission Draft**

5 December 2025

1. Introduction

- 1.1 This document is a Statement of Common Ground between the London Borough of Camden and Natural England, and concerns planning policies included in the Camden Local Plan Proposed Submission Draft at the Regulation 19 stage.
- 1.2 It has been prepared to demonstrate that Camden's Local Plan Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' throughout the plan preparation period in accordance with Paragraph 36 of the National Planning Framework (NPPF) and will inform further engagement to ensure effective implementation of Local Plan policies.
- 1.3 In the spirit of collaboration, the document has been prepared as a 'live' document, which can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating the Statement of Common Ground.
- 1.4 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.
- 1.5 Natural England provided a response to the Camden Local Plan Proposed Submission Draft on 16 May 2025.

2. Strategic Geography

- 2.1 The parties to this SoCG are the London Borough of Camden and Natural England.

London Borough of Camden

- 2.2 Camden is a diverse inner London Borough with a population of approximately 215,000. Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End and City of London. Further north the character changes with many residential areas and neighbourhoods, including Camden Town, Hampstead, Highgate, Swiss Cottage, West Hampstead and Kentish Town, each with their own distinctive identity and characteristics. The character of the borough is also shaped by its topography and by significant parks and open spaces including Hampstead Heath and Primrose Hill. There are no European designated sites for nature conservation in Camden.

- 2.3 London Borough of Camden is bordered by six other London boroughs: City of London, Westminster City Council, London Borough Brent, London Borough Barnet, London Borough Haringey and London Borough Islington.



Natural England

- 2.4 Natural England are the government's adviser for the natural environment in England. Established by an Act of Parliament in 2006, Natural England's purpose is to help conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development.

3. Key Strategic Matters

- 3.1 Many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan or addressed through the preparation of the London Plan. The London Plan is part of the development plan for all planning authorities in London and Local Plans prepared by London boroughs are required to be in general conformity with it.

- 3.2 In London, planning and co-operation on strategic matters concerning the natural environment are generally covered by the London Plan, with more locally specific matters covered in local plans. Natural England are a key stakeholder on the London Plan and Camden, and other boroughs also engage on the preparation of the Plan. It is considered that there are no strategic natural environment matters to be addressed in the context of the Camden Local Plan Proposed Submission Draft that are relevant to the Duty to Co-operate.
- 3.3 Furthermore, the London Borough Camden has engaged with Natural England throughout the preparation of the Local Plan, including on the preparation of the Sustainability Appraisal and Habitats Regulation Assessment, providing an opportunity for strategic natural environment matters to be discussed, however Natural England have not raised any concerns in relation to the Local Plan and has always responded to state they have no comments to make (see Appendix 1).
- 3.4 There are no strategic matters in relation to the Camden Local Plan Proposed Submission Draft upon which Natural England have any concerns. Camden have engaged with Natural England in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan and Natural England are satisfied that the Duty to Co-operate has been met.

4. Matters where the parties agree

- 4.1 In their representation on the Camden Local Plan Proposed Submission Draft (Regulation 19), Natural England responded to say that they had 'no comments' to make.
- 4.2 As part of the consultation Natural England also responded to state that they had 'no significant comments' to make on the Sustainability Appraisal or Habitats Regulations Assessment Screening Opinion.
- 4.3 Given this, both parties agree that there are no unresolved issues at this time.

5. Governance arrangements

- 5.1 This Statement has been prepared as a 'living' document, which will be reviewed and updated as necessary at key stages in the plan-making process, as the Plan progresses through examination.

Signatures

Signed on behalf of London Borough of Camden

R. Burden

Rebecca Burden

Development Plans Manger

5 December 2025

Signed on behalf of Natural England



Ellen Satchwell

Sustainable Development Senior Officer

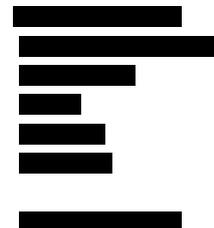
5 December 2025

Appendix 1 – Correspondence with Natural England

Date: 09 January 2019
Our ref: 266952
Your ref: Site Allocations SA Scoping Report



Ms N Tulley
Senior Planner
Regeneration and Planning
Supporting Communities
London Borough of Camden
5 Pancras Square
London N1C 4AG



BY EMAIL ONLY
planningpolicy@camden.gov.uk

Dear Ms Tulley

Camden's Local Plan - Site Allocations SA Scoping Report

Thank you for your consultation request on the above dated and received by Natural England on 6th December 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this Site Allocations poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

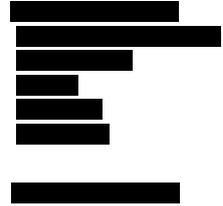
Yours sincerely

Sharon Jenkins
Consultations Team

Date: 28 February 2020
Our ref: 309005
Your ref: Site Allocations Plan & Sustainability Appraisal



London Borough of Camden
Planning Team
5 Pancras Square
London
N1C 4AG



BY EMAIL ONLY

CamdenCouncil@public.govdelivery.com
planningpolicy@camden.gov.uk

Dear Sir or Madam

Planning Consultation: Draft Site Allocations Plan & Sustainability Appraisal (Interim Draft)

Thank you for your consultation request on the above Strategic Planning Consultation, dated 13th February, 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this consultation.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

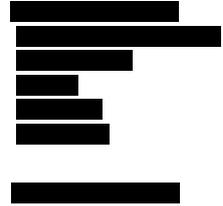
Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Date: 13 March 2020
Our ref: 309552
Your ref: Site Allocations – HRA Screening



Mr A Triggs
Principal Planner
Regeneration and Planning
London Borough of Camden
2nd Floor
5 Pancras Square
5 Pancras Square
London N1C 4AG



BY EMAIL ONLY



Dear Mr Triggs

Planning Consultation: Camden Site Allocations – HRA Screening opinion

Thank you for your consultation request on the above Strategic Planning Consultation, dated 19th February, 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this consultation.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

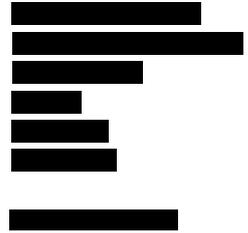
Yours sincerely

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Date: 05 May 2023
Our ref: 428238
Your ref: Camden SA Scoping Report



Ms Nicola Tulley
Principal Planner (Climate Change)
Regeneration and Planning
Supporting Communities
London Borough of Camden
Town Hall Extension (WC1H 8EQ)
5 Pancras Square
London N1C 4AG



BY EMAIL ONLY - planningpolicy@camden.gov.uk



Dear Ms Tulley

Camden SA Scoping Report

Thank you for your consultation request on the above dated and received by Natural England on 3rd April 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in Local Planning and Neighbourhood planning and must be consulted on draft plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England has no specific comments to make on this SA Scoping report.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk

Yours sincerely

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

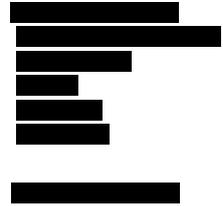
- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Date: 26th February 2024
Our ref: 463999
Your ref: Draft Local Plan



Planning Policy
Camden Council
Camden Town Hall
Judd Street
London
WC1H 8EQ



BY EMAIL ONLY - planningpolicy@camden.gov.uk

Dear Sir or Madam

Draft Camden Local Plan

Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 17th January 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on the draft Local Plan for Camden Council.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

From: [SM-NE-Consultations \(NE\)](#)
To: [REDACTED]
Subject: Camden Local Plan - Habitat Regulations Screening Assessment 2024 Consultation Response
Date: 09 February 2024 16:33:30
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)
[image007.jpg](#)
[image002.png](#)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Nicola Tulley,

Our Ref: 466061

Camden Local Plan - Habitat Regulations Screening Assessment 2024 Consultation

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the Habitat Regulations Screening Assessment 2024 Consultation

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely,

Dominic Rogers

Consultations Team

Natural England

[REDACTED]
[REDACTED]
[REDACTED]

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

ne-email-signature



From: Nicola Tulley <[REDACTED]>

Sent: Monday, February 5, 2024 9:33 AM

To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: HRA Draft Camden Local Plan (LONDON - Keep in Hub)

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Hello,

Camden Council is consulting on a draft new Local Plan. The draft new Camden Local Plan sets out our vision for future development in Camden for the next 15 years and includes the planning policies and site allocations to help achieve this. It identifies how many new homes and jobs are needed to support Camden's population, and where and how they should be provided. The Local Plan also has an important role in shaping how Camden's places look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods.

We have drafted a Habitats Regulation Assessment screening and would appreciate your views on its scope and level of detail. The HRA is available to view on the Local Plan Evidence [webpage here](#).

If you have any questions please contact me.

Kind Regards,

Nicola Tulley
Principal Planner (Climate Change)
Regeneration and Planning
Supporting Communities
London Borough of Camden



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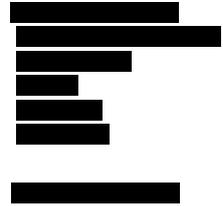
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Date: 16th May 2025
Our ref: 511333
Your ref: Local Plan – draft Submission Version



Planning Policy
Camden Council
Camden Town Hall
Judd Street
London WC1H 8EQ



BY EMAIL ONLY - planningpolicy@camden.gov.uk

Dear Sir or Madam

Local Plan – draft Submission Version

Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 1st May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on your consultation request for the draft Submission Local Plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

From: [REDACTED]
To: [REDACTED] [PlanningPolicy](#)
Subject: FW: FAO Ms Nicola Tulley REF: Camden Local Plan - Sustainability Appraisal (SA)
Date: 20 May 2025 09:15:23
Attachments: [Picture \(Device Independent Bitmap\) 1.jpg](#)

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 20 May 2025 08:04
To: Nicola Tulley <[REDACTED]>
Subject: FAO Ms Nicola Tulley REF: Camden Local Plan - Sustainability Appraisal (SA)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Our Ref: 511594
Your Ref: Local Plan – SA Screening

Dear Ms Tulley

Thank you for your consultation request, dated and received by Natural England on 2nd May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no significant comments to make on the Sustainability Appraisal (SA) for the Local Plan.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Sharon Jenkins
Assistant Officer
Natural England
Consultation Service

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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From: [REDACTED]
To: [REDACTED] [PlanningPolicy](#)
Subject: FW: FAO Ms Nicola Tulley REF: Camden Local Plan Habitats Regulations Assessment (HRA)
Date: 20 May 2025 09:15:53
Attachments: [Picture \(Device Independent Bitmap\) 1.jpg](#)

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 20 May 2025 07:58
To: Nicola Tulley <[REDACTED]>
Subject: FAO Ms Nicola Tulley REF: Camden Local Plan Habitats Regulations Assessment (HRA)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Our Ref: 511590
Your Ref: Local Plan – HRA Screening

Dear Ms Tulley

Thank you for your consultation request, dated and received by Natural England on 2nd May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no significant comments to make on the Habitats Regulations Assessment (HRA) for the Local Plan.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Sharon Jenkins
Assistant Officer
Natural England
Consultation Service

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england



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For further information on the Pre-submission Screening Service see [here](#)

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