

## **Appendix Q - Engagement with prescribed bodies on other matters**

During the preparation of the Camden Local Plan, in addition to engaging on strategic matters, through the duty to co-operate process the Council has also engaged with prescribed bodies in relation to more local matters which do not have a significant impact on at least two planning areas. The majority of matters raised on the Local Plan by prescribed bodies have been on these detailed, locally specific issues, rather than strategic matters. Further detail on this and how it has informed the content of the Local Plan is set out below.

### ***Mayor of London***

The GLA were consulted on the draft Site Allocations Local Plan in 2020 and provided comments to this consultation (see Appendix U to the Council's response to the Inspectors initial letter). These comments helped to inform the approach to the site allocations in the Local Plan.

The Council and the Greater London Authority (GLA), on behalf of the Mayor of London, have had on-going duty to cooperate meetings throughout the Local Plan preparation process. This is evidenced in the meeting notes between the Council and the GLA set out in Appendix 1 of the Statement of Common Ground with the GLA (SD19), which cover the period from May 2021 to September 2025. This dialogue has helped to ensure that the approach taken in the Local Plan is in general conformity with the London Plan.

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

The GLA on behalf of the Mayor of London provided comments on the draft Local Plan (Regulation 18 stage). The comments made related to opportunity areas; the Central Activities Zone; the Local Plan housing target; small sites; affordable housing; Gypsy and Traveller accommodation; tall buildings; industrial and employment land; and office space.

The Council met with the GLA in February 2024, as part of the continuing engagement on the draft Local Plan, to discuss their comments. The following changes were then made in the publication of the Regulation 19 Proposed Submission Draft Local Plan to respond to the comments made by the GLA:

- A new policy on the Euston Area (Policy S2) was added to the Plan.
- Policy H4 Maximising the supply of affordable housing – the policy was updated to more closely align with the London Plan with regards to the use of habitable rooms, the operation of the sliding scale and its relationship with the London Plan Threshold Approach; and estate regeneration schemes.
- Policy IE3 Industry - the supporting text to the policy was updated to refer to the Central Services Area.

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

The Council met with the GLA in September 2025 to discuss their comments, the Council's response to them and agreeing a Statement of Common Ground. The Council and the GLA subsequently agreed a Statement of Common Ground which confirms that there are no unresolved issues between the Council and the GLA in respect of the Camden Local Plan.

### ***Neighbouring Boroughs***

The Council has engaged with neighbouring boroughs (London Borough of Brent, LB Barnet, City of London, LB Islington, LB Haringey and 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. The agendas and minutes of the duty to cooperate meetings held with each authority, which cover the period from 2018 to 2025, are set out in the Addendums to the Statements of Common Ground agreed with each authority (see Appendices A – F to the Council's response to the Inspectors initial letter).

The Council has also worked jointly with Islington, Barnet and Haringey (along with Enfield, Hackney and Waltham Forest) on the preparation of the North London Waste Plan (NLWP), which was adopted in 2022. The NLWP sets out the planning framework for waste management in the Boroughs up to 2037. It identifies sites for waste management use and sets out policies for determining waste planning applications.

The London Borough of Islington commented on both the draft Local Plan (Regulation 18 stage) and the Proposed Submission Draft Local Plan (Regulation 19 stage) in relation to Camden's tall buildings policy. The Council met with Islington in June 2025 to discuss their comments and our response to them. This is addressed in the Strategic issues section of the Council's response to the Inspector's initial letter and agreed through the Statement of Common Ground between Camden and Islington (see submission document SD24 and Appendix E of the Council's response to the Inspectors initial letter).

Barnet commented on Camden Local Plan Proposed Submission Draft (Regulation 19 stage) in relation to the transport impacts of the Plan, although it should be noted that this issue had not previously been raised at any of the duty to co-operate meetings between the two boroughs. They sought confirmation as to whether the cumulative impacts of Camden's proposed site allocations and Barnet's own allocations (particularly those close to the shared administrative boundary) had been considered to establish whether the additional traffic would cause undue concern to Barnet's highway and transport infrastructure, and whether appropriate mitigation measures and funding has been considered / secured.

The Council met with Barnet in September 2025 to discuss their response (see Appendix 1 of Appendix A to the Council's response to the Inspectors initial letter) and provided assurance that the Camden Local Plan Proposed Submission Draft seeks to reduce vehicle use through the delivery of car free development; reductions in off-street car parking, provision of alternative, sustainable modes of travel, supporting improvements to and investment in public transport, and by prioritising the sustainable movement of people, goods, services and materials. The site allocations in the Camden Local Plan Proposed Submission Draft should therefore not give rise to additional traffic that would impact on existing transport infrastructure in Camden or Barnet. The Council also confirmed that these matters will be considered at planning application stage, through the submission of a Transport Assessment, as required by the Local Plan, and that Barnet would be consulted where sites come forward in close proximity to the borough boundary.

In their response to the Camden Local Plan Proposed Submission Draft, Barnet also commented on the following site allocations:

- Site allocation W7 - Gondar Gardens Reservoir
- Site allocation W13 - 551-557 Finchley Road
- Site allocation W14 - 317 Finchley Road

The Council confirmed as part of the meeting held with Barnet in September 2025 that all three sites have planning permission and that W13 and W14 are under construction. Given this, it was agreed that the inclusion of these sites as allocations in the Plan is unlikely to cause any significant impact in Barnet.

Given that the matters raised by Barnet were already addressed by the Local Plan, a change to the content of the Plan was not considered necessary. The Council's response to the comments made by Barnet in their representation on the Camden Local Plan Proposed Submission Draft are set out in the consultation response spreadsheet (submission document SD31).

These matters are covered by the Statement of Common Ground that the Council signed with the London Borough of Barnet, which confirms that there are no unresolved issues between the two boroughs (see Appendix A).

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

Transport for London were consulted on the draft Site Allocations Local Plan in 2020 and provided comments to this consultation (see Appendix L to the Council's response to the Inspectors initial letter). These comments helped to inform the approach to the site allocations in the Local Plan.

Transport for London provided comments on the draft Local Plan (Regulation 18 stage). The comments made related to a number of the site allocations, student accommodation, climate change, delivery led food businesses, basements, and the transport policies in the Plan (see Appendix L).

The following changes were made in the publication of the Regulation 19 Proposed Submission Draft Local Plan to respond to the comments made by TfL:

- Policy S1 South Camden - Part U Infrastructure of the policy was updated to reflect the need to reinstate four tracks and a third platform on the North London line from the 2030s onwards to meet future passenger and freight demand, and provisions have been made in the disposal for this land to be returned to operational rail use when necessary.
- Policy S5 120-136 Camley Street - the policy was updated to include an additional point regarding access to bus services.
- Policy S12 Belgrove House - the policy was updated to refer to the Crossrail 2 Safeguarding Direction.
- Policy S15 Land to the rear of the British Library - the policy was updated to refer to Crossrail 2 infrastructure.
- Policy S17 Selkirk House - the policy was updated to make it clear that existing car parking should be removed.
- Policy C1 Central Camden - Part O Infrastructure was updated to refer to the delivery of step-free access at Chalk Farm underground station. The policy was also updated to refer to the proposed Camden Town station capacity upgrade and plans to reinstate four tracks and a third platform on the North London line from the 2030s onwards.
- Policy C9 100 Chalk Farm Road - the policy was updated to refer to the need to contribute towards a feasibility study and delivery of step free access at Chalk Farm Station.
- Policy C11 Network Rail land at Juniper Crescent - Part 8 of the policy, relating to bus infrastructure, was updated to reflect TfL's comments.
- Policy C13 West Kentish Town Estate - the policy was updated to include a requirement to rationalise parking on the site.
- Policy W1 West Camden - Part L Infrastructure was updated to reference that a new link and step-free access into West Hampstead and/or Finchley Road Underground stations will also improve capacity at those stations. The policy was also updated to refer to the need to improve the interchange experience in the West Hampstead area, including with buses, and resulting pedestrian desire lines between the stations.
- Policy N1 North Camden - the policy was updated to cross refer to the Camden Transport Strategy and Cycling Action Plan.
- Policy T1 Safe, Healthy and Sustainable Transport - the supporting text to the policy was updated to:
  - make reference to supporting the Mayor's target for 80 per cent of all journeys to be made by active, efficient and sustainable modes through including the borough's LIP target of 93 per cent of all journeys in Camden to be made by sustainable modes by 2041, and
  - support the Mayor's Vision Zero target.
- Policy T3 Public transport - the supporting text to this policy was updated to refer to passenger transport interchange facilities needing to be designed and delivered in accordance with Transport for London's Interchange Best Practice Guidelines.

- Policy T5 Parking and car free development - the policy was updated to remove reference to car club spaces and to refer to existing areas of car parking, rather than car parks.
- Policy T6 Sustainable movement of goods, services and materials - the supporting text was updated to clarify that provision for cargo bikes will be in addition to provision for other forms of cycle parking.

TfL's response to the Proposed Submission Draft Local Plan welcomed the amendments made in response to their Regulation 18 comments, and provided further detailed comments and suggestions for amendments to specific policies and site allocations, for example in relation to enhancing bus infrastructure and safeguarding. None of the points raised related to "*strategic matters*"

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

The Council have agreed a Statement of Common Ground with Transport for London which focuses on areas of agreement and disagreement in respect of the matters raised by Transport for London in their response to the consultation on the Plan (see Appendix L).

### ***Historic England***

Historic England were consulted on the draft Site Allocations Local Plan in 2020 and provided comments to this consultation (see Appendix M to the Council's response to the Inspectors initial letter). These comments helped to inform the approach to the site allocations in the Local Plan.

Historic England then responded to the call for views undertaken at the end of 2022 / start of 2023 to inform the preparation of the new Local Plan. The comments made focussed on ensuring that the conservation and enhancement of the historic environment was addressed through strategic policies; that the Council's evidence base for the historic environment was relevant and up to date; and that the implications of other policies on the historic environment is considered (e.g. tall buildings and climate change) (see Appendix M).

The comments made by Historic England were taken into account as part of the preparation of the draft Local Plan (Regulation 18 stage) and helped to shape the approach to design, tall buildings and heritage in the Plan.

Historic England subsequently provided comments on the draft Local Plan (Regulation 18 stage). These related to Policy D5 Heritage, Policy D2 Tall Buildings, Policy SC3 Open space, Policy CC5 Energy reduction in existing buildings, and specific site allocations (see Appendix M).

The Council and Historic England also had a meeting to discuss the Local Plan in September 2024 and following this Historic England provided further detailed comments on some site allocations (see Appendix M).

The following changes were made in the publication of the Regulation 19 Proposed Submission Draft Local Plan to respond to the comments made by Historic England:

- Policy CC5 Sustainability improvements to existing buildings - the policy was updated to refer to the need for whole house retrofit plans where works are proposed to a listed building.
- Policy D2 Tall buildings - the policy was updated to refer to policy D5 Historic Environment.
- Policy D5 Historic Environment - the name of the policy was changed from 'heritage' and the policy was updated in line with Historic England's comments to ensure it is consistent with the NPPF. Reference to heritage-led regeneration was also included in the policy.
- The following site allocations were updated to take into account Historic England's comments - S9 Shorebase Access, S15 Land to the rear of the British Library, S17 Selkirk House, S18 135 - 149 Shaftesbury Avenue, C9 100 Chalk Farm Road, and C10 Juniper Crescent.

Historic England's response to the Proposed Submission Draft Local Plan welcomed the amendments that had been made to individual policies as a result of their previous comments and subsequent discussions.

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

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

### ***Environment Agency***

The Environment Agency were consulted on the draft Site Allocations Local Plan in 2020 and provided comments to this consultation (see Appendix N to the Council's response to the Inspectors initial letter). These comments helped to inform the approach to the site allocations in the Local Plan.

The Environment Agency then responded to the call for views undertaken by the Council at the end of 2022 / start of 2023 to inform the preparation of the new Local Plan. The comments made related to climate change and sustainability, flood risk, ground water quality, water efficiency, waste management, air quality, surface water management, sustainable drainage, green infrastructure and biodiversity (see Appendix N).

The comments made by the Environment Agency were taken into account as part of the preparation of the draft Local Plan (Regulation 18 stage) and helped to shape the approach to climate change, water efficiency, managing flood risk, drainage, the natural environment, water quality and air quality in the Plan.

The Environment Agency subsequently provided comments on the draft Local Plan (Regulation 18 stage). These related to climate change, the circular economy and reduction of waste, minimising carbon emissions, energy reduction in new buildings, overheating and cooling, water efficiency, flood risk, sustainable drainage, natural environment, biodiversity, water quality, design, air quality, noise, transport, and the Local Plan evidence base (see Appendix N).

The following changes were made in the publication of the Regulation 19 Proposed Submission Draft Local Plan to respond to the comments made by the Environment Agency:

- Policy CC3 Circular economy and reduction of waste - the policy was updated to include an expectation for any dismantled materials to be sorted and utilised on site wherever practicable.
- Policy CC5 Sustainability improvements to existing buildings - the policy was updated to encourage the installation of water efficient fixtures and fittings, and rainwater harvesting.
- Policy CC9 Water efficiency - the policy was updated to remove reference to technical feasibility, in line with the London Plan.
- Policy CC11 Sustainable drainage - the supporting text to the policy was also updated to cross reference to Policy NE4 Water quality.
- Policy NE1 Natural environment - the policy was updated to include a cross-reference to Policy CC11 Sustainable Drainage.
- Policy A1 Protecting amenity - the policy was updated to refer to the Agent of Change principle.
- Policy T1 Safe, healthy and sustainable transport - the supporting text to the policy was updated to refer to the Council's Biodiversity Strategy and sustainable urban drainage systems.

The Environment Agency also provided detailed comments on environmental constraints on individual sites at Regulation 18 stage. Amendments to the Plan were made as appropriate. The Environment Agency did not submit any further comments on site allocations in their response to the Submission Draft Local Plan.

In addition to this, following on from the Environment Agency's comments on the draft Local Plan, the Council and the Environment Agency also had a discussion via email in Spring 2025 about how Policy NE4 Water quality should be applied in practice (see Appendix N).

The Environment Agency then provided comments on the Proposed Submission Draft Local Plan, stating that they consider the Plan to be sound. The Council's response to the comments made by the Environment Agency in their representation on the Camden Local Plan Proposed Submission Draft are set out in the consultation response spreadsheet (submission document SD31).

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

## ***Natural England***

The Council has engaged with Natural England throughout the preparation of the Local Plan. Natural England have not raised any concerns in relation to the Local Plan at any point and all of their responses stated they had no comments to make on the Local Plan (see Appendix O to the Council's response to the Inspectors initial letter).

## ***North Central London Integrated Care Board***

The Camden Clinical Commissioning Group (CCG) were consulted on the draft Site Allocations Local Plan in 2020 and the London Healthy Urban Development Unit (HUDU) provided comments to this consultation on their behalf (see Appendix P to the Council's response to the Inspectors initial letter). These comments helped to inform the approach to the site allocations in the Local Plan.

The London Healthy Urban Development Unit (HUDU) responded to the call for views undertaken at the end of 2022 / start of 2023 to inform the preparation of the new Local Plan. The response was prepared in consultation with the North Central London Integrated Care Board (NCL ICB) and NHS providers and welcomed the recognition of the challenge of improving health and wellbeing and of reducing health inequalities and the opportunities that the Local Plan brings for addressing these. The response asked that all new development is required to mitigate its impact on health and social infrastructure and to support the health and wellbeing of new residents and the wider community; in addition to highlighting the need for additional healthcare provision in the West of the borough (see Appendix P).

The comments made by HUDU / NCL ICB / NHS were taken into account as part of the preparation of the draft Local Plan (Regulation 18 stage) and helped to shape the approach to health and well-being and the delivery of health facilities in the Plan.

The HUDU / NCL ICB / NHS response to the draft Local Plan (Regulation 18 stage), noted that the thread of health runs through the document and that specific health issues are covered in individual policies. They provided both general comments and more specific suggestions, and welcomed a number of aspects of the plan such as policies on gambling uses and hot food takeaways (see Appendix P).

The following changes were made in the publication of the Regulation 19 Proposed Submission Draft Local Plan to respond to the comments made by HUDU / NCL ICB / NHS:

- References to Camden Planning Guidance in the Plan were updated to make it clear that the Council expect the guidance to be followed (rather than just referred to).
- Policy DS1 Delivering healthy and sustainable development - the supporting text to the policy was updated to include the following text: "where we live has a profound impact on our health and well-being, it is therefore important that new development prioritises improving the built, natural and social environment in Camden".

- Policy IE9 Delivery led food businesses - the policy was updated to refer to the need to undertake a Health Impact Assessment and assess access to healthy food options.
- Policy SC1 Improving health and wellbeing - Criteria B1 of the policy was updated to replace the word 'promote' with 'support'. Criteria B6 of the policy was updated to refer to the use of developer contributions and NHS requirements. The supporting text to the policy was updated to state that recommendations made in a Health Impact Assessment will be secured by planning condition. Para 10.19 of the supporting text was updated to state "...we will also expect applicants to liaise with NHS partners early on in the design process to identify what mitigation is required in particular circumstances."
- Policy A2 Safety and security - the supporting text to the policy was updated to encourage early engagement with Police Liaison Officers as part of the planning application process.
- Policy A3 Air quality - the supporting text to the policy was updated to provide a definition of poor air quality.
- Policy T5 Parking and car-free development - the supporting text to the policy was updated to refer to the fact that new developments should provide adequate parking for emergency vehicles and for visiting health and care providers.

The Council also worked with HUDU in the preparation of the Health Impact Assessment of the draft Plan (see submission document SD09).

HUDU / NCL ICB / NHS provided a limited number of comments on the Proposed Submission Local Plan. The Council's response to these comments are set out in the consultation response spreadsheet (submission document SD31).

The Council have agreed a Statement of Common Ground with the NCL ICB which focuses on areas of agreement and disagreement between in respect of the matters raised by HUDU / NCL ICB / NHS in their response to the consultation on the Plan (see Appendix P).