

London Borough Camden Statement on Matter 1: Procedural and Legal Requirements

Please note that where document references are included below, these relate to documents in the Council's examination library which is available to view on the [Council's website](#).

Issue:

Whether the Council has complied with the relevant procedural, legal and other requirements.

Questions:

Plan Preparation and Scope

- 1. Has the Plan been prepared in accordance with the latest adopted Local Development Scheme?**
 - 1.1 The Council can confirm that the Plan has been prepared in accordance with the timescales set out in latest Local Development Scheme (document reference SD11), published in September 2025.

- 2. Have the relevant notification, consultation, publication and submission requirements been met in line with the Town and Country Planning (Local Planning) Regulations 2012 and Statement of Community Involvement?**
 - 2.1 The relevant notification, consultation, publication and submission requirements have been met as part of the preparation of the Local Plan in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement (SD12).
 - 2.2 The Council's Regulation 22 Statement of Consultation which comprises five parts (see SD26 – 30) sets out how the Council has undertaken public consultation and stakeholder involvement as part of the preparation of the Local Plan, including at the Regulation 18 and Regulation 19 stages, in accordance with the Council's adopted Statement of Community Involvement (SCI) and Town and Country Planning (Local Planning) (England) Regulations 2012. The statement also sets out how consultation has shaped the Plan, along with the main issues raised by representors and the Council's response to these.

- 2.3 The Local Plan making process started in 2022 and has included three main stages of public engagement: an initial ‘call for views’ was undertaken in 2022/2023 for a period of ten weeks (see SD28 - Summary of the early consultation and engagement undertaken to inform the development of the draft Local Plan); consultation on the Regulation 18 Draft Local Plan was undertaken in 2024 for a period of eight weeks (see SD27 - Summary of the responses received on the draft Local Plan); and consultation on the Camden Local Plan Proposed Submission Draft Regulation 19 stage was undertaken in 2025 for a period of 8 weeks (see SD26 - Main issues raised through the consultation on the Camden Local Plan Proposed Submission Draft).
- 2.4 Prior to this, the Council had consulted on a draft Site Allocations Local Plan in 2020 and late 2021 / early 2022 (see SD28). The decision was subsequently made to incorporate the proposed site allocations into the draft new Local Plan.
- 2.5 With regards to the submission of the Plan. The documents submitted for examination are those set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. In accordance with the Regulations these documents are available to view in the [examination library](#) on the Council’s website and hard copies of the relevant documents have been made available to view in the library at the Council’s office at 5 Pancras Square.
- 2.6 Further to this, an email was sent to relevant parties on the 8 October 2025 to notify them that the Plan had been submitted to the Secretary of State for examination; explain where they could view the relevant documentation; and provide guidance on the examination process moving forward.

3. What is the plan period and how is it justified?

- 3.1 The Local Plan covers a 15 year period from 2026 – 2041. This is in line with paragraph 21 of the National Planning Policy Framework 2024, which states that “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities” and is therefore considered to be justified based on the intention that the Council will adopt the Plan in 2026.
- 3.2 The evidence base that has been prepared to support the Plan also covers the period to 2041, and a housing trajectory has been prepared to demonstrate how sites are expected to come forward over the period to 2041 to meet the housing target proposed in the Submission Draft Camden Local Plan. The plan period is therefore appropriate and justified.

4. What policies that make up the current development plan will be retained and what policies will be superseded following adoption of the submitted Plan?

- 4.1 The development plan for Camden consists of the Camden Local Plan 2017 (LD01), Site Allocations Plan 2013 (LD02), Euston Area Plan 2015 (LD04), Fitzrovia Area Action Plan 2014 (LD03), North London Waste Plan 2022 (LD05), and a number of Neighbourhood Plans (LD09 – LD15), in addition to the London Plan (RD01).
- 4.2 The **Camden Local Plan 2017** will be superseded in full following the adoption of the submitted Plan.
- 4.3 The majority of the policies in the **Site Allocations Plan 2013** will be superseded by adoption of the submitted Local Plan, with the exception of the following policies which will be retained until the adoption of the new Euston Area Plan:
- Site 9 – Euston Station, Euston Road;
 - Site 10 – BHS Warehouse, 132 - 140 Hampstead Rd and 142 Hampstead Rd;
 - Site 11 – Granby Terrace Depot;
 - Site 12 – 110 - 122 Hampstead Road (Former National Temperance Hospital);
 - Site 14 – Westminster Kingsway College, Regent's Park Centre, Longford Street; and
 - Site 15 – Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East / Augustus St.
- 4.4 The Council is currently reviewing the **Euston Area Plan 2015**. Once adopted, the new Euston Area Plan (EAP) will replace the current EAP and the site allocation policies in the Camden Site Allocations Plan 2013 listed above, which lie within the Euston Area Plan boundary.
- 4.5 Opportunity Sites 1 to 14 in the **Fitzrovia Area Action Plan 2014** will be superseded following the adoption of the submitted Local Plan. The remainder of the Area Action Plan will be retained.
- 4.6 The **North London Waste Plan 2022** will be retained in full.
- 4.7 **Neighbourhood plans** have been made for Fortune Green and West Hampstead (2015); Kentish Town (2016); Highgate (2017); Dartmouth Park (2020); Camley Street (2021); Redington Froggnal (2021); Hampstead (2025) and Kilburn (2026). The Local Plan is not intended to supersede these Plans which have been prepared by the community.
- 4.8 A policy replacement schedule is set out in Appendix 1 of the Camden Local Plan Proposed Submission Draft.
5. **Does the Plan clearly distinguish between strategic and non-strategic policies? Are strategic policies limited to those necessary to address the strategic priorities of the area and any relevant cross-boundary issues?**

5.1 The Local Plan clearly distinguishes between strategic and non-strategic policies. Paragraph 1.43 of the Local Plan states... “All the policies in the Local Plan are considered to be strategic policies, with the exception of the following, which are considered to be non-strategic policies:

- Policy IE7 – Hot Food Takeaways;
- Policy IE8 – Gambling Uses;
- Policy SC5 – Food Growing;
- Policy D6 – Basements;
- Policy D7 – Advertisements and Signage;
- Policy D8 – Shopfronts;
- Policy A4 – Noise and Vibration.”

5.2 Policies that are identified as ‘strategic’ set out the overall strategy for the pattern, scale and design quality of places and make provision for homes, employment, retail and leisure development; infrastructure; community facilities; and the conservation and enhancement of the natural and historic environment, including measures to address climate change, in accordance with the National Planning Policy Framework 2024.

6. In terms of existing and proposed Supplementary Planning Documents (SPD):

6a. Please provide their title, scope and timescales for adoption

6.1 The Council has 74 adopted Supplementary Planning Documents (including topic specific guidance, area based planning frameworks and conservation area appraisals and management strategies). These are collectively known as ‘Camden Planning Guidance’ (CPG) and were prepared to provide additional information and guidance on the implementation of the policies in the Camden Local Plan 2017.

6.2 The Council will review and update the topic specific CPG set out in the table below following the adoption of the submitted Plan, to ensure they are aligned with the policies in the new Local Plan. These will be published for public consultation.

Title	Scope	Adoption Date
Access for All (LD16)	This CPG provides general guidelines on accessibility and specific advice in relation to accessible buildings, listed buildings and heritage assets, accessible streets and places, public transport and parking, and design and access statements.	March 2019
Adverts (LD17)	This CPG provides advice on the design and siting of advertisements so that they contribute positively to the appearance and character of an area.	March 2018
Air Quality (LD18)	This CPG provides information on key air quality issues within the borough and provides advice on assessing air quality	January 2021

Title	Scope	Adoption Date
	impacts and achieving air quality neutral development.	
Amenity (LD19)	This CPG provides information on key amenity issues within the borough including: <ul style="list-style-type: none"> • Overlooking, privacy and outlook • Daylight and sunlight • Artificial light • Construction management plans • Noise and vibration • Wind and micro-climate • Contaminated land. 	January 2021
Artworks, statues and memorials (LD20)	This CPG provides information on artworks, statues and memorials within the borough, and sets out the minimum requirements that Camden expects for applications for public art and all commemorative works including statues and memorials.	March 2019
Basements (LD21)	This CPG gives detailed advice on how we will apply planning policies when making decisions on new basement development or extensions to existing basement accommodation.	January 2021
Biodiversity (LD22)	This CPG provides guidance for planning proposals for major and minor developments proposed on sites where there is or may be biodiversity value. It aims to help applicants apply biodiversity considerations to planning proposals by use of the five-point Mitigation Hierarchy.	March 2018
Community uses, leisure and pubs (LD23)	This CPG provides guidance on how the Council will protect and enhance community, cultural, leisure and pub provision in the borough.	January 2021
Design (LD24)	This CPG provides information on all types of detailed design issues within the borough.	January 2021
Developer Contribution (LD25)	The purpose of this guidance is to set out why 'developer contributions' are required. The CPG provides information on procedural matters related to developer contributions and how planning obligations operate alongside the Community Infrastructure Levy.	March 2019
Digital Infrastructure (LD26)	This CPG provides guidance on how the Council aims to enable improved internet access through the acceleration of high speed connectivity, including public wireless systems.	March 2018

Title	Scope	Adoption Date
Employment sites and business premises (LD27)	<p>This CPG provides guidance on the circumstances when the Council will consider alternative uses for employment sites. It also provides information on:</p> <ul style="list-style-type: none"> • marketing requirements • Hatton Garden, the Kentish Town Industry Area, Kentish Town Regis Road Growth Area and mixed-use developments • the affordability of workspaces • planning obligations. <p>As part of the review of the CPG this document will be re-named Delivering an inclusive economy.</p>	January 2021
Energy efficiency and adaptation (LD28)	<p>This CPG provides information on key energy and resource issues within the borough. It covers:</p> <ul style="list-style-type: none"> • The Energy Hierarchy • Making building more efficient • Decentralised energy • Renewable energy technologies • Energy statements • Energy reduction • Energy efficiency in existing buildings • Reuse and optimising resource efficiency • Sustainable design and construction • Sustainable assessment tools <p>As part of the review of the CPG the Council intends to replace this CPG with a new CPG entitled 'Responding to the climate emergency'.</p> <p>The new CPG will provide further guidance on the application of policies and any submission requirements in Chapter 8 of the Local Plan – specifically focusing on the following themes:</p> <ul style="list-style-type: none"> • Demolition • Circular economy and reduction of waste • Minimising carbon emissions • Improvements to existing buildings • Energy use and renewable energy • Overheating and cooling • Water efficiency • Flood risk • Sustainable drainage • Water quality 	January 2021

Title	Scope	Adoption Date
Energy efficiency planning guidance for conservation areas (LD40)	This CPG provides guidance to residents who are considering making energy efficiency improvements to residential properties in conservation areas.	September 2014
Home improvements (LD29)	This CPG provides guidance to homeowners about how they can adapt and improve their home as their circumstances change.	January 2021
Housing (LD30)	This CPG provides detailed information on the operation of a number of policies regarding the development of housing in the borough. It provides specific guidance on: <ul style="list-style-type: none"> • Providing affordable housing • Meeting requirements for housing and affordable housing • Proposals for off-site delivery of housing • Payments in lieu • Viability assessments • Planning obligations • Residential development standards (including accessibility) • Development involving net loss of homes. 	January 2021
Planning for health and wellbeing (LD31)	This guidance explains: <ul style="list-style-type: none"> • When Health Impact Assessments (HIA) should be prepared and what they might contain; • How the Council will manage the impacts of certain town centre uses on health and wellbeing; and • How the planning process can enhance the quality of life for population groups with greater health and wellbeing needs. 	January 2021
Public open space (LD32)	This guidance sets out: <ul style="list-style-type: none"> • Which developments are expected to make provision for open space and play facilities; • The amount of open space we expect; • The type of open space we expect; • How we will calculate the open space expected for a specific development; • The Council's expectations relating to design, quality and play facilities; and • How contributions may be used to enhance 'green infrastructure' networks 	January 2021

Title	Scope	Adoption Date
	in Camden to provide environmental and quality of life benefits.	
Planning Statement on the Council's Intermediate Housing Strategy and First Homes (LD38)	The Planning Statement sets out the proposed approach to these types of housing, to guide the implementation of Camden planning policies and the assessment of planning applications. As part of the review of the CPG this will be combined with the Housing CPG.	March 2022
Retrofit Planning Guidance (LD39)	This guidance has been developed to help residents understand the planning process required to install low carbon technologies in homes. As part of the review of the CPG, the Council intends to replace this CPG with a new CPG entitled 'Responding to the climate emergency'.	October 2013
Student housing (LD33)	This guidance provides information on the development of housing specifically for occupation by students, including new build, conversion and change of use. It provides specific guidance on: <ul style="list-style-type: none"> • Securing a supply of student housing • Creating a mixed, inclusive and sustainable community • Design, standards and facilities • Planning obligations for student housing 	March 2019
Town centres and retail (LD34)	This CPG sets out further detailed guidance on how the Council will implement its policies for town centres and retail development. It includes detailed area specific information for each designated centre. This document also provides further detailed information on the management of food, drink, and entertainment uses in designated centres.	January 2021
Transport (LD35)	This CPG provides information on all types of detailed transport issues within the borough and includes the following sections: <ul style="list-style-type: none"> • Assessing transport impact • Travel Plans • Delivery and Servicing Plans • Parking and car-free development • Car parking management and reduction • Vehicular access and crossovers • Cycling facilities • Pedestrian and cycle movement • Petrol stations. 	January 2021

Title	Scope	Adoption Date
Trees (LD36)	This guidance is aimed at development which may affect the welfare of a tree or trees or planting new trees as part of a proposed scheme.	March 2019
Water and flooding (LD37)	This CPG provides information on the water environment in Camden, water efficiency and flooding.	March 2019
Conservation Area Appraisals and Management Strategies	Camden has 40 adopted Conservation Area Appraisals and Management Strategies. These define the special character of a conservation area and set out our approach for its preservation and improvement.	Various
Canalside to Camley Street (LD45)	The SPD builds on existing policies and priorities in the adopted Local Plan. It sets out key planning aims and design principles to help shape future development proposals in the area.	November 2021
Camden Goods Yard (LD48)	The SPD builds on existing policies and priorities in the adopted Local Plan. It sets out key planning aims and design principles to help shape future development proposals in the area.	July 2017
Gospel Oak and Haverstock Community Vision (LD49)	The guidance sets out some key development principles and planning objectives to help shape, influence and guide future development proposals in the area so that they can deliver positive benefits for the local community.	November 2022
Holborn Vision (LD44)	The role of this SPD is to build on the policies in Camden's adopted Local Plan to guide development and investment to improve places and spaces and enhance the experience of living, working and visiting Holborn.	January 2025
Kentish Town Planning Framework (LD46)	The SPD builds on existing policies and priorities in the adopted Local Plan. It sets out key planning aims and design principles to help shape future development proposals in the area.	July 2020
Regis Road Area Guidance (LD47)	The SPD builds on the policies and priorities in the adopted Local Plan to guide future development, investment and infrastructure delivery in the Regis Road Area to help deliver comprehensive regeneration.	March 2025
West End Lane to Finchley Road (LD50)	The SPD builds on existing policies and priorities in the adopted Local Plan. It sets out key planning aims and design principles to help shape future development proposals in the area.	September 2021

Title	Scope	Adoption Date
Mount Pleasant	The SPD is intended to guide the redevelopment of the Mount Pleasant site. It has been prepared jointly with the London Borough Islington. As development here is almost complete this SPD will not be carried forward to sit under the new Plan.	February 2012
King's Cross Opportunity Area Planning and Development Brief	The SPD is intended to guide the redevelopment of the Kings Cross Opportunity Area. It has been prepared jointly with the London Borough Islington. As development here is almost complete this SPD will not be carried forward to sit under the new Plan.	February 2012

6b. What is the intended relationship of each of the SPDs with specific policies in the Plan?

6.3 The table below sets out the intended relationship of each SPD with specific policies in the submitted Plan.

SPD	Relationship with the Local Plan
Access for All	This CPG will provide further guidance to support policy SC2 Access for all.
Adverts	This CPG will provide further guidance to support policy D7 Advertisements and signage.
Air Quality	This CPG will provide further guidance to support policy A3 Air quality.
Amenity	This CPG will provide further guidance to support policy A1 Protecting Amenity.
Artworks, statues and memorials	This CPG will provide further guidance to support policies D1 Achieving design excellence, D5 Historic environment, and SC4 Open Space.
Basements	This CPG will provide further guidance to support policy D6 Basements.
Biodiversity	This CPG will provide further guidance to support policy NE2 Biodiversity.
Community uses, leisure and pubs	This CPG will provide further guidance to support policies SC3 Social and community infrastructure, SC6 Cultural facilities and SC7 Public houses.
Design	This CPG will provide further guidance to support policies D1 Achieving design excellence, D2 Tall buildings, D3 Design of housing, D4 Extensions and alterations to existing buildings, D5 Historic Environment, D8 Shopfronts, SC1 Improving health and wellbeing, A2 Safety and security, SC2 Access for all and SC4 Open space.

SPD	Relationship with the Local Plan
Developer Contribution	This CPG will provide further guidance to support policy DM1 Delivery and monitoring.
Digital Infrastructure	This CPG will provide further guidance to support policies IE1 Growing a successful and inclusive economy and DM1 Delivery and monitoring.
Delivering an inclusive economy	This CPG will provide further guidance to support policies IE1 Growing a successful and inclusive economy, IE2 Offices, IE3 Industry, IE4 Affordable workspace, and S3 Hatton Garden Jewellery Area.
Home improvements	This CPG will provide further guidance to support policy CC5 Sustainability improvements to existing buildings.
Housing	This CPG will provide further guidance to support policies H1 Maximising housing supply, H2 Maximising the supply of self-contained housing from mixed use schemes, H3 Protecting existing homes, H4 Maximising the supply of affordable housing, H5 Protecting and improving affordable housing, H6 Housing choice and mix, and H7 Large and small homes.
Planning for health and wellbeing	This CPG will provide further guidance to support policy SC1 Improving health and wellbeing.
Public open space	This CPG will provide further guidance to support policy SC4 Open space.
Responding to the climate emergency	This CPG will provide further guidance to support policies CC2 Prioritising the retention of existing buildings, CC3 Circular economy and reduction of waste, CC4 Minimising carbon emissions, CC5 Sustainability improvements to existing buildings, CC6 Energy use and the generation of renewable energy, CC7 Heat networks, CC8 Overheating and cooling, CC9 Water efficiency, CC10 Flood risk, CC11 Sustainable drainage.
Student housing	This CPG will provide further guidance to support policy H9 Purpose built student accommodation.
Town centres and retail	This CPG will provide further guidance to support policy IE6 Supporting designated centres.
Transport	This CPG will provide further guidance to support policies T1 Safe, healthy and sustainable transport, T2 Prioritising walking, wheeling, and cycling, T3 Public transport, T4 Shared transport infrastructure and services, T5 Parking and car-free development and T6 Sustainable movement of goods, services and materials.
Trees	This CPG will provide further guidance to support policy NE3 Tree planning and protection.

SPD	Relationship with the Local Plan
Water and flooding	This CPG will provide further guidance to support policies CC9 Water efficiency, CC10 Flood risk and CC11 Sustainable drainage.
Energy efficiency planning guidance for conservation areas	This CPG will provide further guidance to support policies CC5 Sustainability improvements to existing buildings and D5 Historic Environment.
Canalside to Camley Street	This SPD will provide further guidance to support policy S1 South Camden and relevant site allocation policies.
Camden Goods Yard	This SPD will provide further guidance to support policy C1 Central Camden and relevant site allocation policies.
Gospel Oak and Haverstock Community Vision	This SPD will provide further guidance to support policy C1 Central Camden and relevant site allocation policies.
Holborn Vision	This SPD will provide further guidance to support policy S1 South Camden and relevant site allocation policies.
Kentish Town Planning Framework	This SPD will provide further guidance to support policy C1 Central Camden and relevant site allocation policies.
Regis Road Area Guidance	This SPD will provide further guidance to support policy C1 Central Camden and relevant site allocation policies.
West End Lane to Finchley Road	This SPD will provide further guidance to support policy W1 West Camden and relevant site allocation policies.

6c. Is this relationship clear and appropriate?

6.4 The submitted Plan clearly sets out the relationship between the policies in the Plan and the SPDs set out above. Here references are included in the supporting text of relevant policies to direct the reader to where further detail and guidance is available in Camden Planning Guidance, that they should have regard to. It is therefore considered that the relationship is clear and appropriate.

6d. Are there any elements of the SPDs that should be contained within policy?

6.5 As part of the preparation of the Local Plan adopted SPDs were reviewed and where relevant, any elements of SPD that were considered should be contained within policy, were included in the policies of the Plan.

Sustainability Appraisal

(Please focus on the legal compliance of the Sustainability Appraisal. Any implications of the Sustainability Appraisal on the soundness of individual policies should be addressed elsewhere).

7. In terms of the Sustainability Appraisal:

7a. Is the methodology applied robust?

- 7.1 The SA Report (SD03) presents a clear and robust methodology which has been used to evaluate the environmental, social, and economic effects of the Plan and reasonable alternatives, in accordance with planning legislation and guidance. Chapter 2 of the SA Report sets out the methodology that has been followed for each stage of the SA process.
- 7.2 The SA/SEA has been undertaken in accordance with the Planning and Compulsory Purchase Act 2004; the Environmental Assessment of Plans and Programmes Regulations 2004 (referred to as ‘the SEA Regulations’); and National Planning Policy Guidance, which sets out how SA/SEA should be undertaken as part of the plan-making process.
- 7.3 The likely sustainability effects of the Camden Local Plan Proposed Submission Draft are summarised in Chapters 4, 5, 6 and 7 of the SA Report with the SA appraisal tables included at Appendix 3 and 4.
- 7.4 The Council also commissioned consultants Aecom to act a ‘critical friend’ in support of the SA process to ensure the approach taken to the SA was robust in line with legislative requirements and established good practice.
- 7.5 AECOM’s review of the Camden Local Plan SA Report (SD05) concluded that “The SA Report presents a clear and robust appraisal of the plan and reasonable alternatives”.

7b. Is the baseline information upon which the Sustainability Appraisal is based up to date and relevant in terms of its scope?

- 7.6 The baseline information upon which the SA is based on is up to date and relevant in terms of its scope.
- 7.7 The SA Scoping Report 2023 (SD06) sets out the detailed policy context, baseline, and key sustainability issues (including their likely evolution without the Local Plan) for Camden. The baseline information sought to make use of up-to-date and available evidence and was collected under a number of subtopics, classified as environmental, social or economic. This informed the identification of sustainability issues and the development of the SA framework.

7.8 The baseline information and sustainability issues were updated over the course of the SA process where relevant new information and supporting evidence was collected. This information is summarised in Table 3.1 of the SA Report, which presents the key sustainability issues that were identified through the analysis of the baseline and the review of relevant policies, plans and programmes.

7c. How were the appraisal framework objectives of the Sustainability Appraisal derived and how do they link to the individual policies in the Plan?

7.9 Table 3.2 in the SA Report sets out the SA objectives (known collectively as the SA Framework). The SA objectives have been developed from the previous SA objectives used in the sustainability appraisal of the Camden Local Plan (2017) and draft Site Allocations Local Plan (2020) and updated to take into account changes in the key sustainability issues facing the borough, comments from consultation bodies, and updates to the international, national, sub-regional and local policy objectives that provide the context for the Plan.

7.10 The SA objectives are broadly grouped into three categories: social; environmental; and economic, with specific objectives set out under each category which directly relate to the individual policies in the Plan. In total, the SA Framework comprises 15 objectives. The table below shows how the SA objectives link to the policies in the Plan.

Ref	SA Objective	Local Plan Policies
1	To promote the provision of a range of high quality and affordable housing to meet local needs	DS1, H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11 and relevant Site Allocation Policies
2	To promote a healthy community	DS1, CC5, IE6, SC1, SC2, SC3, SC4, SC5, SC6, SC7, T1, T2 and relevant Site Allocation Policies
3	To tackle poverty and social exclusion and promote equal opportunities	DS1, H1, IE1, SC1, SC2, SC3, SC4, SC5, SC6, SC7 and relevant Site Allocation Policies
4	To improve amenity by minimising the impacts associated with development	DS1, A1, A2, A3, A4 and relevant Site Allocation Policies
5	To conserve and improve open space provision	DS1, SC1, SC4 and relevant Site Allocation Policies
6	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	DS1, NE1, NE2, NE3 and relevant Site Allocation Policies
7	To improve local air quality and limit exposure	DS1, A1, A3, T1, T2 and relevant Site Allocation Policies

Ref	SA Objective	Local Plan Policies
8	To promote the efficient use of energy, water and other natural resources, throughout the life of the development	DS1, CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8, CC9 and relevant Site Allocation Policies
9	To protect and manage water resources (including groundwater)	DS1, CC1, CC9, CC11, NE4 and relevant Site Allocation Policies
10	To ensure our buildings and environment can adapt to a changing climate	DS1, CC1, CC8, CC10 and relevant Site Allocation Policies
11	To promote high quality and sustainable urban design	DS1, D1, D2, D3, D4, D5, D6, D7, D8 and relevant Site Allocation Policies
12	To protect and enhance the historic environment	DS1, D1, D5 and relevant Site Allocation Policies
13	To ensure new development makes efficient use of land, buildings and infrastructure	DS1, CC1, CC2 and relevant Site Allocation Policies
14	To encourage and accommodate sustainable economic growth and employment opportunities	DS1, IE1, IE2, IE3, IE4, IE5, IE6, IE7, IE8, IE9, IE10 and relevant Site Allocation Policies
15	To ensure our designated centres remain sustainable and adaptable for the future	DS1, IE1, IE6 and relevant Site Allocation Policies

7d. How were the options considered through the Sustainability Appraisal for the following:

i. The overall scale of housing and other growth

ii. The broad distribution of development across the Borough

7.11 This response seeks to address 7.d.i and 7.d.ii together. To identify reasonable growth scenarios for the scale and distribution of development across the borough, the Council took both a top down and bottom up approach. First, overarching ‘top down’ strategic factors (in terms of quantum and spatial distribution) that could have a bearing on growth scenarios were explored. Then, a ‘bottom up’ approach was taken to consider the individual site options available, which are the key building blocks for any growth scenario. Finally, taking into account strategic factors and available site options, an area-based approach was taken and growth options for sub-areas in Camden were explored.

7.12 Section 4.1.1 of the SA Report provides a detailed assessment of strategic factors, namely scale and distribution, that have a bearing on the definition of reasonable growth scenarios in Camden. Section 4.1.2 of the SA Report identifies the site options available to define the reasonable growth scenarios. Section 4.1.3 explores

growth options for each of Camden's sub-areas: South Camden, Central Camden, West Camden and North Camden. Then Section 4.2 sets out reasonable growth scenarios for appraisal taking into account the quantum and distribution of growth, and site options available for delivering growth.

iii. Potential allocation sites

7.13 Section 4.1.2 of the SA Report sets out the process undertaken to identify site options for appraisal in the SA and Appendix 5 sets out sites considered as part of the preparation of the Local Plan, but which were not allocated. The SA Report concludes that sites have been excluded from further consideration for clear cut reasons, relating to limited development potential, policy conflicts, availability, and sites either being under construction or recently developed.

iv. Individual policy approaches

7.14 Chapter 5 of the SA Report sets out the reasonable policy options (alternatives) that were identified and appraised as part of the preparation of the Local Plan Proposed Submission Draft. Several reasonable alternatives were identified in relation to policy options, these focused on:

- maximising the supply of self-contained housing from mixed use schemes;
- prioritising the retention of existing buildings;
- sustainability improvements to existing buildings;
- energy use and the generation of renewable energy;
- affordable workspace.

7.15 The options that were considered, and their assessment, are set out in paragraphs 5.4 – 5.35 of the SA Report, with the full appraisal of alternative policy options provided in Appendix 3.

7e. Is the assessment of the likely effects of the Plan's strategy, policies and allocations adequate? Is the scoring against the Framework objectives reasonable?

7.16 The assessment of the likely effects of the Plan's strategy, policies and allocations is adequate and the scoring against the SA Framework is reasonable.

7.17 The SA appraises the likely effects of growth and spatial options, the vision and objectives of the Plan, site options and policy options against the SA Framework.

7.18 The appraisal of the growth options is presented under 15 headings – one for each of the objectives that together comprise the SA framework, before the final section presents an overview 'matrix'. Under each heading, the aim is to: 1) rank the scenarios in order of performance (with a star indicating best performing); and then 2) categorise the performance in terms of 'significant effects' (as shown in the table below).

7.19 The vision and objectives, site options and policy options presented in the Local Plan Proposed Submission Draft have also been appraised against the SA framework. The findings of the SA are presented as colour coded symbols showing the significance of the likely effect of each site option, policy or site allocation in relation to each SA objective, along with a concise justification for the effect identified, where appropriate. This is shown in the table below.

Key to SA effects symbols

Key	Effect
	Significant positive effect
	Positive effect
	Neutral effect
	Minor negative effect
	Significant negative effect
	Uncertain effects

7.20 For each objective, the merits of the Plan as whole were considered, before an overall conclusion on significant effects was reached. Specifically, the statutory requirement is to “identify, describe and evaluate” significant effects taking into account the available evidence and also being mindful of wide-ranging effect characteristics, e.g. ‘long term’. Significant effects are defined as follows:

- An effect is a predicted change to the baseline situation, which is not simply a snapshot of the current situation, but also a projection of the current situation in the absence of the Local Plan
- The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets.

7.21 Where an effect was considered to be uncertain, a question mark was added, and the symbol colour coded yellow. Neutral effects were recorded where a policy or site allocation was considered to have no effect in contributing to achievement of the SA objective.

7.22 Every effort was made to predict effects accurately; although the assessment inevitably requires a series of judgements to be made. The appraisal attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy in relation to the SA objective in question was considered to be of such magnitude that it would have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. Effects are relative to the scale of proposals under consideration.

7.23 The likely sustainability effects of the Camden Local Plan Proposed Submission Draft are summarised in Chapters 4, 6 and 7 of the SA Report with the SA appraisal tables included at Appendix 3 and 4.

7.24 The SA report was published alongside the Local Plan for consultation at both Regulation 18 (see EB44) and Regulation 19 stage (see SD03) and no comments have been received that question the assessment undertaken or the scoring against the SA Framework.

7f. Is consideration of reasonable alternatives and reasoning for rejecting alternatives clearly justified?

7.25 The consideration of reasonable alternatives and reasoning for rejecting alternatives is clearly justified in the SA Report.

7.26 The SA identified reasonable alternatives in relation to the quantum of growth, spatial distribution, site options, and policy options. The options were then evaluated against the SA Framework to select a preferred approach.

7.27 Section 4.2 of the SA Report identifies reasonable growth scenarios for appraisal taking into account the quantum and distribution of growth, and site options available (see sections 4.1.1 and 4.1.2 of the SA Report). Table 4.1 of the SA Report outlines three reasonable alternative growth scenarios – lower growth, the emerging preferred option and higher growth. These growth scenarios are then appraised in section 4.3 of the SA.

7.28 Table 4.2 in the SA Report presents a summary of the findings of the appraisal of the reasonable alternative growth scenarios. Section 4.4 of the SA Report sets out the Council's justification for discounting the lower growth scenario and higher growth scenario. It also explains why the Council's preferred growth option is the emerging proposed approach.

7.29 Chapter 5 of the SA Report sets out the reasonable policy options (alternatives) that were identified and appraised as part of the preparation of the Local Plan Proposed Submission Draft and provides clear justification for why reasonable alternative policy options were rejected and why the Council's preferred policy option was selected.

7g. How have the conclusions of the Sustainability Appraisal been reflected in the Plan?

7.30 Chapter 9 of the SA Report sets out the overarching conclusions of the SA. The SA found that, overall, the growth strategy and policies in the Camden Local Plan Proposed Submission Draft perform better than, or similar to, the reasonable

alternatives tested, and that, overall, the Plan will have a positive effect against social, economic and environmental objectives.

- 7.31 The SA shows that the policies in the Plan have the potential to generate significant positive effects for the borough across the range of sustainability issues tested through this SA process, as shown in the number of positive cumulative effects identified in Chapter 7 of the SA Report.
- 7.32 The scale of development proposed through the Plan does have the potential to generate some negative effects on the borough's existing biodiversity and heritage assets, community facilities, water and air quality. However, every effort has been made in the Plan to avoid and minimise any negative effects through a robust and diverse range of policy approaches.
- 7.33 Work on the Local Plan and the SA has been taken forward as an iterative process and policies in the Plan were updated as necessary to reflect SA recommendations, to ensure consistency across the policies, mitigation of any negative effects, and conformity with the NPPF and the London Plan.
- 7.34 The following changes were made to the draft Local Plan, prior to the publication of the Proposed Submission Draft Plan, to reflect the findings of the SA:
- Relevant site allocations were updated to support the delivery of housing for older people or those with care or support requirements.
 - An 'Access for all' policy (Policy SC2) was included in the Plan, incorporating
 - accessible and friendly design principles.
 - Relevant site allocations were updated to refer to the need to provide cycle route connections, improved walking and cycling routes.
 - A water quality policy (Policy NE4) was included in the Plan to respond to the Environment Agency's comments on the SA Scoping Report.
 - Site allocations near SINC's were reviewed to ensure they include measures to enhance biodiversity and create green links where feasible.

8 Have any concerns been raised about the undertaking and / or outcomes of the Sustainability Appraisal and what is the Council's response to these?

- 8.1 The Council can confirm that no concerns have been raised by either statutory bodies or individual representors at either Regulation 18 or Regulation 19 stage in relation to the undertaking and / or outcomes of the SA.
- 8.2 The Council received two comments on the SA at Regulation 19 stage from Representor ID7 (see SD31). These comments relate to a specific site allocation - site W8 - 88-92 Kilburn High Road. A summary of the Representors comments and Council's response are set out below:

- 8.3 **Comment 1** - The statement in the Sustainability Appraisal at paragraph 4.99 'given the location of this site and the need to ensure an on-going retail presence, there is little or no potential to deliver additional development here' should be removed as it is unsound. Development options have not been fully explored, and this could prejudice a future planning application.
- 8.4 **Council's response** - The purpose of the Sustainability Appraisal is to identify and appraise a range of growth scenarios. As part of the process of defining reasonable growth scenarios the Sustainability Appraisal considers strategic factors which have a bearing on growth scenarios, individual site options which have a bearing on the delivery of growth and also options around the delivery of growth for the sub-areas identified in the Local Plan. Para 4.99 therefore needs to be seen in the wider context of informing the consideration of reasonable high level growth scenarios in the Sustainability Appraisal. Ultimately any planning application for 88-92 Kilburn Rd will be determined against the policies in the Council's development plan, not the Sustainability Appraisal.
- 8.5 **Comment 2** - The statement at paragraph 7.106 lists the site and says, 'West End Lane is Locally Listed.' This statement is misleading and should be amended to make clear exactly which buildings on West End Lane are locally listed.
- 8.6 **Council's response** - The purpose of para 7.106 of the Sustainability Appraisal is to identify site allocations that are either in a Conservation Area or in close proximity to a Listed Building or Locally Listed Building. The site in question (88 - 92 Kilburn High Rd) is adjacent to a Locally Listed building on West End Lane (2 West End Lane)

9. Have the legal requirements for Sustainability Appraisal / Strategic Environmental Assessment been met as part of the plan preparation process?

- 9.1 The Council can confirm that the legal requirements for Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) have been met as part of the Plan preparation process.
- 9.2 The SA Report has been prepared in accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, which requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. The SA appraised the likely significant social, environmental and economic effects of the policies and proposals within the plan and this process was undertaken from the outset of the development of the Plan.
- 9.3 The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA).

- 9.4 SA and SEA are separate processes, but have similar aims and objectives. The Council has followed Planning Practice Guidance and undertaken a joint SA and SEA of the Local Plan, and the SA Report incorporates the requirements of the SEA Regulations.
- 9.5 Appendix 1 of the SA Report sets out how the relevant chapters in the Sustainability Appraisal meet the SEA Regulations requirements, to show how the requirements of the SEA Regulations have been met through the SA process.

Habitats Regulations Assessment (HRA)

10. How was the HRA carried out and is the methodology appropriate?

- 10.1 A HRA Screening Assessment has been undertaken for both the draft Local Plan 2024 (EB47) and the Proposed Submission Draft Local Plan 2025 (SD07) and published for comment alongside the Plan at both the Regulation 18 and Regulation 19 stages.
- 10.2 The HRA Screening Assessment was undertaken in accordance with the Habitats Regulations 2017 (as amended) and guidance published by the Department for Environment, Food and Rural Affairs February 2021 (updated in 2023).
- 10.3 HRA Screening Assessment follows a staged assessment process, starting with screening, to identify whether or not a Plan risks having a significant effect on a European site, on its own or in combination with other proposals. If that is not the case, the subsequent stage of appropriate assessment is not required. The following sets out the steps undertaken in the HRA Screening Assessment of the draft Camden Local Plan in accordance with national legislation and guidance:
- 10.4 **Step 1 - Identification of sites.** The HRA guidance suggests that location is the primary determinant of whether an effect is likely or not. For the purposes of the screening assessment, European sites within approximately 10km radius of the borough of Camden were considered. This distance is considered to be the maximum over which measurable effects could occur. The Council used Natural England's 'Magic map' (which shows the location of designated European sites and potential sites) to identify sites. There are five sites within a 10km radius of the borough and no sites within the borough.
- 10.5 **Step 2 - Understand the conservation objectives for the sites and consider existing threats and pressures.** This involved checking the conservation objectives, threats and pressures for the sites identified in Step 1.
- 10.6 **Step 3 - Check for combined effects.** Table 1 in the HRA Screening Assessment identifies the key reasons for the designation of each European site and summarises the conclusions of the HRA of the London Plan 2021 in relation to the potential of significant effects on the sites from policies contained in the London Plan. The

ongoing review of the Euston Area Plan has included a HRA which concluded that an Appropriate Assessment is not required. It is anticipated that the review of the London Plan will include a HRS.

10.7 **Step 4 - Assess the likely significant effect.** As part of the screening assessment possible pathways of impact leading to likely significant effects from the Local Plan on European sites were considered. Whether an effect is 'likely' is interpreted as a simple question of whether the plan or project concerned is capable of having an effect. An assessment was undertaken of the whole Plan and the policies contained within it. This found that the draft Plan would not be capable of having any adverse impacts on any of the five identified European sites.

10.8 **Step 5 - Is the next stage of HRA required?** The screening assessment concluded that a Stage 2 Appropriate Assessment is not required and the results of the screening were published and shared with Natural England who confirmed to the Council they had no comments to make on the HRA at both Regulation 18 and Regulation 19 stage. No other comments have been received on the HRA.

10.9 The methodology used in the HRA Screening Assessment is therefore considered to be appropriate. Further information on the approach taken is set out in the HRA Screening Assessment (SD07).

11. Does the HRA identify all the relevant sites?

11.1 The HRA Screening Assessment identifies all relevant sites, and these are set out at paragraph 2.4 of the report. The Council used Natural England's 'Magic map' which shows the location of designated European sites (and potential sites) to identify relevant sites. All sites within a 10km radius of the borough were identified and assessed.

12. What potential impacts of the Plan, including in combination effects, were identified through the HRA and how have these been considered and addressed?

12.1 Section 3 of the HRA Screening Assessment sets out the findings of the assessment of the potential impacts of the Plan, including in combination effects. The screening assessment considered the scope of the Local Plan and its relationship with other plans, in particular the adopted London Plan.

12.2 The screening assessment concluded that the policies in the Camden Local Plan Proposed Submission Draft, in combination with other plans and projects, are not considered likely to have significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. Furthermore, Table 3 in the HRA Screening Assessment demonstrates that the policies in the Plan would not have any adverse impacts on any of the five identified European sites.

12.3 Given these findings, it was not considered necessary to carry out an Appropriate Assessment of the Plan.

13. How have the conclusions of the HRA informed the preparation of the Plan?

13.1 The HRA Screening Assessment concluded that the policies in the Camden Local Plan Proposed Submission Draft, in combination with other plans and projects, are not considered likely to have significant effects on the sites of European importance for habitats or species or have an adverse impact on the integrity of the sites. As such a further Appropriate Assessment was not required. Given this, it has not been necessary to make any changes to the Local Plan.

14. Are the screening findings in the HRA justified and has a precautionary approach been taken?

14.1 Section 3 of the HRA Screening Assessment sets out the findings of the assessment of the potential impacts of the Plan, including in combination effects. The screening assessment has been carried out in accordance with the relevant national legislation and guidance following the steps outlined above. The findings of the screening assessment were shared with Natural England and published for consultation at the Regulation 18 and 19 stages (see EB47 and SD07 respectively). No issues with the approach taken in the HRA were raised by Natural England during the consultations. The screening findings in the HRA are therefore justified.

14.2 The Council can confirm that a precautionary approach has been taken to the HRA Screening Assessment. The precautionary principle ensures plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the sites in question. A thorough assessment has been made covering every policy and site allocation policy in the Local Plan, taking the precautionary approach. This assessment is set out in Table 3 of the HRA Screening Assessment.

14.3 The screening assessment used coding criteria to assess whether the Plan is likely to impact on the European sites. An effect was considered to be 'significant' if it could undermine the site's conservation objectives. The 'test of significance' can generally be interpreted as any negative effects that are not negligible or inconsequential. Whether an effect is 'likely' is interpreted as a simple question of whether the plan or project concerned is capable of having an effect.

14.4 The HRA Screening Assessment found that there was no risk of the proposals in the Local Plan having a significant effect on the conservation objectives of a European site and as such appropriate assessment was not required.

15. Have any concerns been raised regarding the HRA and if so, what is the Council's response to the points made?

15.1 The Council can confirm that no concerns have been raised regarding the HRA Screening Assessment.

16. How has Natural England been involved in HRA matters and how have any concerns raised been responded to?

16.1 The Council engaged with Natural England on the HRA Screening Assessment at both Regulation 18 (EB47) and Regulation 19 (SD07) stage. Natural England have responded on both occasions to confirm that they had no comments to make. The Statement of Common Ground with Natural England confirms there are no unresolved issues between the two parties (ED03o).

17. Overall, how does the HRA meet the Conservation of Habitats and Species Regulations 2017 as amended?

17.1 The HRA Screening Assessment demonstrates that the policies in the Camden Local Plan Proposed Submission Draft, in combination with other plans and projects, are not considered likely to have significant effects on the five sites of European importance for habitats or species lying within a 10km radius of the borough, or an adverse impact on the integrity of the sites. As such, a Stage 2 Appropriate Assessment was not required. Given this, it is clear that the HRA ensures that the requirements of regulations 63 and 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) are met.

Climate Change

18. How does the Plan ensure the mitigation of and adaption to climate change, paying regard to the duty in S19(1A) of the Planning and Compulsory Purchase Act 2004?

18.1 Section 19 1A of the Planning and Compulsory Purchase Act 2004 states that: "Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change".

18.2 Climate change has been a key consideration throughout the preparation of the Local Plan, and the Plan seeks to respond to this through the introduction of a suite of policies (in Chapter 8 of the Local Plan).

18.3 The Introduction to the Plan (Chapter 1) identifies a number of key challenges and issues, including responding to the climate and ecological emergency. Paragraph

1.50 of the Plan recognises that “a key challenge for the Plan is therefore to ensure that development in Camden seeks to mitigate and adapt to climate change and enhance biodiversity by:

- making the best use of sites in the most accessible locations;
- using less energy;
- minimising the use of resources;
- following the principles of a circular economy, where re-use and recycling are prioritised;
- delivering net gains in biodiversity;
- supporting tree planting; and
- ensuring that buildings and spaces are designed to cope with more extreme weather.”

18.4 The Local Plan sets out a number of strategic objectives to deliver the Council’s vision and ambitions for Camden, including “to ensure that development in Camden responds to the climate emergency by delivering zero carbon development, reducing energy use in existing buildings, optimising resource efficiency, achieving the highest possible environmental standards, and requiring buildings and spaces to be designed and constructed to adapt to, and reduce, the effects of climate change”.

18.5 As set out in Table 1 of the Local Plan, key policies in that help facilitate the delivery of this objective include: DS1 Delivering healthy and sustainable development, CC1 Responding to the climate emergency, CC2 Prioritising the retention of existing buildings, CC3 Circular economy and reduction of waste, CC4 Minimising carbon emissions, CC5 Sustainability improvements to existing buildings, CC6 Energy use and the generation of renewable energy, CC7 Heat networks, CC8 Overheating and cooling, CC9 Water efficiency, CC10 Flood risk, CC11 Sustainable Drainage, D1 Achieving design excellence, D2 Tall buildings, D3 Design of housing, D4 Extensions and alterations to existing buildings, D5 Historic environment, NE1 The natural environment and NE2 Biodiversity.

19. How has the Council had regard to all other relevant matters set out in section 19 of the Planning and Compulsory Purchase Act 2004 and Regulation 10 of the Town and Country Planning (Local Planning) Regulations 2012?

19.1 Section 19 of the Planning and Compulsory Purchase Act 2004 concerns the preparation of local development documents and Regulation 10 of the Town and Country Planning (Local Planning) Regulations 2012 relates to local plans and supplementary planning documents: additional matters to which regard is to be had.

19.2 The majority of the matters covered by Section 19 of the 2004 Act and Regulation 10 of the 2012 Regulations have already been addressed in the responses given to the previous questions (see above). Given this, it is considered that the only remaining matter to be addressed relates to Section 19(2) of the Planning and Compulsory Purchase Act 2004.

19.3 Here, the Council can confirm that the Local Plan has been prepared having regard to national policy and guidance issued by the Secretary of State; the London Plan 2021 and Mayoral Guidance; local documents, including other development plan documents. A list of the documents relied upon in the preparation of the Local Plan is set out in the Council's [examination library](#).

Equality and Diversity

20. In relation to those who have a relevant protected characteristic, how does the Plan seek to ensure that due regard is had to the 3 aims expressed in section 149 of the Equality Act 2010?

20.1 The Council undertook an Equalities Impact Assessment (EqIA) of the draft Local Plan in order to be able to demonstrate that the Plan and its preparation have had due regard to the three aims expressed in section 149 of the Equality Act 2010 (eliminating prohibited conduct, advancing equality of opportunity, and fostering good relations), in addition to fulfilling the Public Sector Equality Duty.

20.2 An Equalities Impact Assessment was undertaken of both the draft Local Plan (Regulation 18 stage) (see EB46) and the Proposed Submission Local Plan (Regulation 19 stage) (see SD08). The EqIA considered the impact of the Plan on groups that are protected in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It also considered the impact of the Plan on:

- foster carers;
- looked after children/care experienced people;
- low income households;
- refugees and asylum seekers;
- parents (of any gender, with children aged under 18);
- people who are homeless;
- private rental tenants in deprived areas;
- single parent households;
- social housing tenants; and
- gypsies and travellers.

20.3 The Equalities Impact Assessment identified many positive impacts resulting from Plan policies, particularly in relation to the provision of affordable housing; meeting housing needs for specific groups; jobs and training; the accessibility of buildings and space; provision of open space; design of public spaces; safety and security; health and well-being; and the provision and protection of community and cultural facilities. It identified one potential negative impact on the age protected characteristic, resulting from the Policy T5 Parking and car-free development. It was concluded, on balance, that the wider benefits of the car-free policy, along with the many other positive impacts that the Plan will have on people with protected

characteristics and other characteristics, outweigh the one potential negative impact identified for the Age characteristic in the Equalities Impact Assessment.

Duty to Co-operate

21. Meeting housing need, accommodation for Gypsies and Travellers and tall buildings have been identified as strategic matters requiring cross boundary co-operation for the Plan. Have all the genuinely strategic matters requiring cross boundary co-operation been identified?

- 21.1 All the genuinely strategic matters requiring cross boundary co-operation for the Camden Local Plan have been identified. Further information relating to this is set out in the Council's letter to the Inspector dated the 12 December 2025 (ED03).
- 21.2 Section 33A (4) of the Planning and Compulsory Purchase Act 2004 defines a strategic matter as – “sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.”
- 21.3 As London has a spatial development strategy (the London Plan), the majority of strategic matters that would have a significant impact on at least two planning areas are considered at a London-wide level through the London Plan, with the local element of these matters considered through borough local plans.
- 21.4 The Council, along with other London boroughs and key stakeholders, engage with the GLA as part of 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.
- 21.5 Given this, it is considered that the only strategic matters that remain to be dealt with through the preparation of the Camden Local Plan are meeting housing need; Gypsy and Traveller accommodation; and tall buildings. It should also be noted that no other strategic matters requiring cross boundary co-operation were identified in relation to the Plan by either the GLA on behalf of the Mayor of London or other respondents.

22. Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters with cross-boundary impacts, in order to maximise the effectiveness of plan preparation?

- 22.1 The Council has constructively and actively engaged with prescribed bodies in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan, providing an opportunity for the relevant “strategic matters” to be considered and any concerns in relation to the Plan to be addressed. This is

evidenced in the Council's Duty to Co-operate Statement (SD17) and the Council's letter to the Inspector dated the 12 December 2025 (ED03).

23. Has any neighbouring authority or Duty to Co-operate body indicated that the duty to co-operate has not been complied with? If so, what was the Council's response?

23.1 No neighbouring authority or duty to co-operate body have indicated that they consider that the duty to co-operate has not been complied with.

24. The Council has provided additional information to supplement Statements of Common Ground with neighbouring Local Planning Authorities. Have all relevant signed and dated Statements of Common Ground been provided and are they consistent with the requirements of the National Planning Policy Framework and the associated Planning Practice Guidance? If not, why?

24.1 The Council can confirm that all relevant signed and dated Statements of Common Ground have been provided. The Council considers that the Statements of Common Ground are consistent with the requirements set out in the National Planning Policy Framework 2024 and the associated Planning Practice Guidance. Further information in relation to this is set out in the Council's letter to the Inspector dated the 12 December 2025 (ED03).

25. The Council has provided additional information and Statements of Common Ground with 6 prescribed bodies. Have all the relevant bodies been identified and are the submitted Statements of Common Ground provided consistent with the requirements of the National Planning Policy Framework and the associated Planning Practice Guidance? If not, why?

25.1 The Council has prepared Statements of Common Ground with the following prescribed bodies: Mayor of London; Transport for London; Historic England; Environment Agency; Natural England; and the North Central London Integrated Care Board.

25.2 The Council does not consider it necessary to prepare Statements of Common Ground with the remaining prescribed bodies for the reasons set out in the Council's letter to the Inspector dated the 12 December 2025 (ED03).

25.3 The Council considers that the Statements of Common Ground are consistent with the requirements set out in the National Planning Policy Framework 2024 and the associated Planning Practice Guidance.

26. What implications, if any, does Minister Pennycook’s letter dated 27 November 2025 have for the examination? Specifically, if the Duty were to cease to apply over the course of this examination does the Council’s co-operation raise any soundness concerns and, if not, how does the evidence base support that view?

26.1 The Written Ministerial Statement on ‘Reforming Local Plan Making’ issued on 27 November 2025 and the letter of the same date from the Minister of State for Housing and Planning to the Chief Executive of the Planning Inspectorate on ‘Local plan reforms – Update to the Duty to Co-operate’ confirm that that the duty to co-operate will not be ‘saved’ in the forthcoming new plan-making regulations. Therefore, the requirement will be removed for plans in the current system, with the Duty ceasing to apply when the Regulations come into force (anticipated to be in early in 2026). The Secretary of State’s letter notes that Local Planning Authorities should continue to collaborate across boundaries and that plans should continue to be examined in line with the policies in the NPPF on ‘maintaining effective co-operation’.

26.2 The Plan has been prepared based on effective and ongoing cross-boundary joint working and co-operation in accordance with both the statutory duty to co-operate and the soundness considerations in the NPPF. The Council does not consider that, if the Duty were to cease to apply over the course of the examination, its co-operation raises any soundness concerns.

26.3 The Council has undertaken constructive, active and ongoing engagement with adjoining authorities and relevant bodies on strategic matters relating to the preparation of the Proposed Submission Draft Plan. It has considered the views on strategic matters expressed by relevant bodies during engagement and co-operation activities and those have informed the Plan as appropriate.

26.4 Information on the co-operation undertaken in the preparation of the draft Local Plan is set out in the Council’s Duty to Co-operate Statement (SD17) and the Council’s letter to the Inspector dated the 12 December 2025 (ED03). The Statements of Common Ground provided to the Inspector to support the examination of the Plan also demonstrate that the Council has undertaken effective and on-going joint working with other relevant bodies.

General Conformity with the London Plan

27. Overall, is the Plan in general conformity with the London Plan and how is that evidenced?

27.1 It is a requirement that local plans, taken as a whole, to be in general conformity with the spatial development strategy as a whole. As set out in the Council’s General Conformity Topic Paper (TP01), the Council considers that the Camden Local Plan Proposed Submission Draft as a whole is in general conformity with the London Plan

2021 as a whole, and this is confirmed in the Statement of Common Ground between the Council and the GLA (SD19).

27.2 The Council also considers that individual Local Plan policies are consistent with individual London Plan policies, as set out in Appendix R of the Council's letter to the Inspector dated the 12 December 2025 (ED03r). The GLA have confirmed in their Statement of Common Ground with the Council that there are no outstanding issues related to the strategic matters raised in the Mayor's Regulation 19 response.

28. Does the statement in SD19 that there are "no outstanding issues" apply to all strategic and soundness matters or only those listed? What issues are still dependent on future evidence before they can be resolved and how will this be addressed?

28.1 The Council can confirm that the above statement applies to all strategic and soundness matters in relation to the submitted Plan. There are no unresolved issues between the Council and the GLA.

29. Is it clear how individual policies in the Plan relate to those of the London Plan?

29.1 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.

29.2 The London Plan sets out matters that boroughs should consider when preparing development plans and these were considered when preparing the individual policies in the Local Plan.

29.3 Where appropriate, references are included in the Plan to relevant London Plan policies and Mayoral Guidance. It is not however considered necessary or appropriate to set out within the Plan how every individual policy relates to the London Plan.

30. Do any of the policies in the Plan duplicate the content of the London Plan? If yes, please provide details and justification.

30.1 The Council does not consider that any of the policies in the Plan duplicate the content of the London Plan 2021. While the Submission Draft Local Plan policies cover matters that are also covered in the London Plan, the Local Plan sets out a Camden-specific approach to how these matters will be considered and relevant policy objectives achieved. The relationship between the content of the Local Plan

and the London Plan is consistent with the approach taken in the adopted Camden Local Plan, and the substantial majority of other London borough local plans.

30.2 Policy PM1 Spatial development strategies, in the draft NPPF (2025) states that the content of spatial development strategies “should be genuinely strategic in nature and allow for more detailed issues to be considered and addressed through other parts of the development plan.” Although the wording may change in the published version of the NPPF, the current review of the London Plan is expected to be more focussed and strategic than the comprehensive and detailed existing London Plan, in line with the expectations set out in Policy PM1.

30.3 As the content of the next London Plan, which the Mayor / GLA are aiming to adopt in 2027, is likely to be less comprehensive and have less detailed content in relation to many matters. Not including matters in the Camden Local Plan where they may also be addressed in the London Plan 2021 risks leaving a future policy vacuum for the borough when the new London Plan is adopted. That would not be effective plan making.

31. Where a policy proposes a variation to a London Plan policy should the distinction be identified for clarity and effectiveness?

31.1 Policy SD4 of the London Plan 2021 sets out the Mayor’s approach to London’s Central Activities Zones (CAZ), part of which falls within Camden. Policy SD5 Offices, other strategic functions and residential development in the CAZ states that new residential development should not compromise the strategic functions of the CAZ.

31.2 The Local Plan supports the development of a mix of uses, including permanent self-contained housing, across the borough and including within the CAZ, to help meet housing needs (see Local Plan Policy H2 Maximising the supply of self-contained housing from mixed-use schemes).

31.3 Developing a mix of uses on individual sites and across an area can also be beneficial in other ways, such as:

- increasing community safety and security by providing a range of activities that attract people at different times during the day and evening;
- contributing to the creation of areas that are diverse, distinctive and attractive;
- reducing the need to travel between homes, jobs and services;
- overcoming the loss of customers for shops and services arising from increased home-working and less consistent occupation of workplaces; and
- allowing an efficient use of land, with housing developed above those uses which benefit from direct ground floor access or a street-level frontage, such as shops.

- 31.4 Paragraph 7.68 of the Local Plan does however recognise that...” In some areas, there may be local priorities to be balanced against the priority given to housing, particularly in the Central Activities Zone (CAZ). The town centres and the CAZ provide frontages that are key to the area’s retail and service function, and these should not be compromised by the introduction of alternative uses or extensive entrance lobbies. The CAZ also supports some uses that have a national or international function and make major contributions to Camden’s economy, and their needs will be given significant weight.”
- 31.5 Whilst Policy H2 of the Local Plan proposes a variation to London Plan policy it is not considered necessary for this distinction be identified in the Plan either for clarity or effectiveness. Furthermore, the remaining policies in the Plan are considered to be consistent with those in the London Plan.
- 31.6 The Council therefore considers that the Camden Local Plan Proposed Submission Draft as a whole is in general conformity with the London Plan 2021 as a whole, and this is confirmed in the Statement of Common Ground between the Council and the GLA (SD19) and Appendix R of the Council’s letter to the Inspector dated the 12 December 2025 (ED03r).

Oxford Street Development Corporation

32. What is the latest on the establishment of the Oxford Street Development Corporation, and does it have any implications for the examination?

- 32.1 The Council has provided the Inspector with a note on the recently formed Oxford Street Development Corporation (OSDC) (ED07).
- 32.2 The note provided stated that a Planning Functions Order for the Development Corporation is currently being prepared by the government, and that it was expected that, following the publication of the Order, the OSDC will have full planning powers in this area in respect of both plan-making and decision-taking from 1 April 2026.
- 32.3 The Council understands that the Functions Order is now unlikely to complete the parliamentary process by 1 April, meaning that the transfer of planning powers will take place later than envisaged. We can update the Inspector when we have a new date for the transfer of planning powers.
- 32.4 The Council has engaged with the OSDC on arrangements relating to development plan documents, including the Submission Draft Local Plan. After the secondary legislation regarding the Corporation’s planning powers has been issued, the Council and the OSDC will prepare a joint note for the Inspector.
- 32.5 The OSDC will be taking on planning powers relating to a small part of the area covered by the boroughwide draft Camden Local Plan and none of the site allocations in the draft Local Plan are located within the OSDC boundary.

32.6 The Council considers that there is nothing in the Oxford Street Development Corporation (Establishment) Order 2025 that impacts on the examination of the Proposed Submission Draft Local Plan or prevents the Inspector from deciding that the document complies with the matters set out in section 20(5) of the Planning and Compulsory Purchase Act 2004.