

London Borough of Camden

**Camden Local Plan Proposed Submission Draft  
2025**

**DUTY TO CO-OPERATE STATEMENT**

October 2025

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## 1. Introduction and legal context

- 1.1 This duty to co-operate statement outlines how the Camden Local Plan Proposed Submission Draft has been prepared in accordance with the statutory duty to co-operate and sets out how the London Borough of Camden has co-operated with other bodies in the preparation of the document. This Statement accompanies the Submission Draft (Regulation 19) version of the Local Plan and supporting documents, which will be submitted to the Secretary of State for examination.
- 1.2 This statement has been written to demonstrate how the Council has fulfilled its duty to co-operate obligations, as set out under Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), and Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has also produced a Statement of Consultation, which sets out how the Council has consulted relevant bodies during the preparation of the Submission Draft Local Plan.
- 1.3 Section 110 of the Localism Act 2011 inserted Section 33A and Section 20(5)(c) into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed (being those identified in regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012). The prescribed bodies are:
- Environment Agency
  - Historic England
  - Natural England
  - Mayor of London (as represented by the Greater London Authority (GLA))
  - Civil Aviation Authority
  - Homes and Communities Agency (now Homes England - the GLA undertakes this function in London)
  - each integrated care board established under Chapter A3 of Part 2 of the National Health Service Act 2006
  - NHS England
  - Office of Rail Regulation
  - Transport for London
  - Each highway authority (in Camden this is the Council and Transport for London)
  - Marine Management Organisation.
- 1.4 The duty to co-operate requires local planning authorities to engage constructively, actively and on an ongoing basis in the preparation of development plans in so far as they relate to a strategic matter (that is, a matter that has or would have a significant impact on at least two planning

areas). Local Planning Authorities must demonstrate how they have complied with the duty to co-operate at the examination of their Plan.

- 1.5 The National Planning Policy Framework (NPPF) December 2024 states that strategic policy-making authorities should collaborate to identify the relevant strategic matters they need to address in their plans. They should also engage with their local communities and other relevant bodies including elected Mayors.
- 1.6 Paragraph 26 of the NPPF states that: “In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”
- 1.7 In order to demonstrate effective and on-going joint working, the NPPF expects authorities to prepare and maintain statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. See section 3 below.
- 1.8 This Statement has been updated as necessary prior to the submission of the Draft Local Plan to reflect ongoing engagement with key stakeholders and partners.

## 2. Camden context

- 2.1 Camden lies with inner London and borders six other boroughs - Westminster City Council, the City of London, and the London Boroughs of Barnet, Brent, Haringey and Islington. See Map 1 below.
- 2.2 Our neighbouring boroughs are at various stages of local plan preparation as shown in the table below.

Borough	Local Plan stage
City of London	<ul style="list-style-type: none"> <li>• City of London Local Plan - adopted January 2015</li> <li>• Draft City Plan 2040 - submitted for examination August 2024</li> </ul>
London Borough of Barnet	<ul style="list-style-type: none"> <li>• Barnet Local Plan - adopted March 2025</li> </ul>
London Borough of Brent	<ul style="list-style-type: none"> <li>• Brent Local Plan - adopted February 2022</li> </ul>
London Borough of Haringey	<ul style="list-style-type: none"> <li>• Strategic Policies - adopted 2013 - alterations adopted July 2017</li> <li>• Development Management and Site Allocations Development Plan Documents - adopted July 2017</li> </ul>

	<ul style="list-style-type: none"> <li>• New Local Plan: First Steps consultation - November 2020 - March 2021; Call for sites - Summer 2024</li> </ul>
London Borough of Islington	<ul style="list-style-type: none"> <li>• Islington Local Plan - adopted September 2023</li> <li>• Gypsy and Traveller Local Plan Review - consultation on the scope of the review - March 2024</li> </ul>
Westminster City Council	<ul style="list-style-type: none"> <li>• Westminster City Plan - adopted April 2021</li> <li>• City Plan Partial Review - submitted for examination - November 2024</li> </ul>

**Map 1 - Camden and neighbouring local authorities**



2.3 London has its own spatial development strategy, the London Plan, which forms part of the development plan for Camden and all London boroughs. The current London Plan was adopted in March 2021. Planning for strategic matters, and co-operation within London, generally takes place at the London-wide level to inform the London Plan and is co-ordinated by the Greater London Authority (GLA). Camden’s Local Plan, and all other borough local plans, must be in general conformity with the London Plan.

- 2.4 The London Plan sets out a London-wide planning approach to strategic issues such as housing and affordable housing, areas of growth and the Central Activities Zone, economic development, climate change, and infrastructure and transport. The Camden Local Plan helps to deliver the strategic objectives of the London Plan, interpreting and building upon the objectives that relate to Camden.
- 2.5 Camden's designated neighbourhood forums are consulted at all stages during the preparation of the Local Plan and other planning policy documents.

***Draft New Camden Local Plan***

- 2.6 The Draft New Camden Local Plan has been through a number of stages of preparation:
- An initial 'call for views' on the Local Plan review was carried out between 4 November 2022 and 13 January 2023 to enable residents, community groups, businesses and other interested parties to share their views on the adopted Local Plan 2017 and priorities for the future. This informed the preparation of the Draft New Camden Local Plan.
  - Consultation on a Draft New Camden Local Plan ran from 17 January to 13 March 2024. The comments made were considered in the preparation of the Regulation 19 Submission Draft version of the new Local Plan.
  - Publication of the Submission Draft Camden Local Plan for public comment for comment took place in May - June 2025.
- 2.7 Alongside the publication of the Submission Draft Camden Local Plan, in May 2025 the Council wrote to all London boroughs under the duty to co-operate to ask whether they would be in a position to:
- assist Camden in meeting the accommodation needs of Gypsies and Travellers; and
  - assist Camden in identifying a five year housing land supply of deliverable sites at examination (with the first five years of the Plan period being from 2026/27 to 2030/31).

Further detail on the responses received are set out in Section 4 of this Statement.

- 2.8 The Council also carried out consultation and engagement on a draft Site Allocations Local Plan in early 2020 and again winter 2021/22. Following this, the Council decided to incorporate site allocations into the new draft Local Plan, rather than progressing them as a separate plan. The comments received during engagement on the site allocations informed the allocations contained in the draft Local Plan.
- 2.9 Throughout the preparation of the Submission Draft Local Plan the Council have taken, and will continue to take, a collaborative approach to plan-making that considers a range of issues, including strategic matters. This statement

sets out how the relevant 'duty to co-operate' bodies have been involved in the evolution of the Plan, and how this involvement has helped shape the proposed approach.

- 2.10 Camden Council considers that this statement demonstrates that it has met the duty to co-operate requirements as set out in the Localism Act 2011 and described in the NPPF and that the Council has effectively co-operated with relevant bodies constructively, actively and on an ongoing basis throughout the preparation of the Plan.

### **3. Co-operation activities with relevant bodies**

#### **Neighbouring local authorities**

- 3.1 Camden has met with all six of its adjoining local authorities - the London boroughs of Barnet, Brent, Haringey and Islington, Westminster City Council and the City of London - throughout the process of reviewing of the Camden Local Plan (including preparation and consultation activities on the draft Site Allocations Local Plan). The dates of duty to co-operate meetings with neighbouring boroughs and the matter discussed are set out in Appendix 1.
- 3.2 All meetings with neighbouring boroughs featured updates on progress with each council's local plan and other planning policy documents, and discussions on updated evidence documents and relevant cross boundary issues, as appropriate. Strategic matters discussed included the overall approach to housing, affordable homes, student housing, and provision for Gypsy and Traveller accommodation. Other items that were regularly discussed included changes to national planning policy and legislation, the London Plan, and neighbourhood planning.
- 3.3 Camden has three cross boundary neighbourhood forums - Highgate (with Haringey), Kilburn (with Brent) and Mount Pleasant (with Islington). In addition to duty to co-operate meetings, Council officers have worked closely with colleagues in these boroughs to provide support and advice to the neighbourhood forums, and to co-ordinate decision-making and other statutory duties related to neighbourhood planning.
- 3.4 Camden has worked jointly with the London Boroughs of Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest to prepare the North London Waste Plan. The Plan was adopted by Camden and the other six boroughs in 2022 and forms part of each council's statutory development plan. The Plan identifies suitable sites for the management of north London's waste and policies for determining planning applications for waste facilities.

#### **Mayor of London / Greater London Authority**

- 3.5 The Mayor of London / Greater London Authority prepare the London Plan, the statutory spatial development strategy for Greater London. Borough plans must be in 'general conformity' with the London Plan. The Council co-operates

with the GLA, and other London boroughs, on the preparation of the London Plan and the evidence base that supports it. This includes the currently ongoing Strategic Housing Land Availability Assessment (SHLAA), which will inform borough housing targets in the next version of the London Plan. Camden also provides the GLA with local data through the Planning London Database.

- 3.6 Camden actively engages with the Greater London Authority through duty to co-operate meetings to discuss the Local Plan and London-wide policy and their alignment. Camden officers met with GLA officers throughout the preparation of the Local Plan to discuss specific issues raised during consultation and engagement. The dates of duty to co-operate meetings between Camden and the GLA and the matters discussed are set out in Appendix 1. GLA and Camden officers both also attend Londonwide meetings which discuss matter of strategic importance for the capital (see paragraph 3.9).
- 3.7 The GLA / Mayor of London responded to consultation on the Draft Local Plan (Regulation 18) and Proposed Submission Draft Local Plan (Regulation 19). Further detail on the GLA's responses is set out in Section 4 below. The Council has had subsequent discussions with the GLA about their response to the Proposed Submission Draft Local Plan and is preparing a Statement of Common Ground with them to address the issues raised. Further information relating to the 'general conformity' of the Local Plan is also set out in the Council's General Conformity Topic Paper.

### **Transport for London**

- 3.8 Transport for London (TfL) is the integrated transport authority for London. It is responsible for implementing the Mayor's Transport Strategy, the capital's public transport network and its strategic road network. Camden works closely with TfL on land use planning and transport planning matters. This includes regular liaison meetings between Council planning officers and the TfL Borough Planning Team to discuss planning policy, major planning applications and highways and public realm enhancement projects. Further detail on TfL's responses to consultation on the Local Plan is set out in Section 4 below.

### **Other London-wide and sub-regional bodies**

- 3.9 Camden is a member of various sub-regional partnerships and working groups, which address strategic planning matters. These include Central London Forward (CLF), a sub-regional partnership of central London boroughs, covering the local authorities of Camden, the City of London, Hackney, Haringey, Islington, Kensington and Chelsea, Lambeth, Lewisham, Southwark, Tower Hamlets, Wandsworth and Westminster. CLF facilitates discussions and co-operation on planning, transport and regeneration / economic development issues. Meetings of the Central London Forward Planning Officers Groups attended by Camden officers are set out in Appendix 1.



- 3.10 Camden officers attend meetings of the Association of London Borough Planning Officers (ALBPO) Development Plans Committee and the London Boroughs Infrastructure Network, to which all London boroughs are invited. These are London-wide forums for the discussion of strategic issues and include updates from authorities on policy work and relevant issues. Meetings attended by Camden officers are set out in Appendix 1.
- 3.11 Camden has representation on the London North Central Flood Risk Partnership, which is a collaboration involving several boroughs and other key stakeholders to address flood risk in the area. The partnership aims to manage flood risk in a strategic and co-ordinated manner. The Council is also working with London Councils and other interested boroughs on the development of a London Surface Water Strategy.
- 3.12 Camden worked with 18 London boroughs and a consultant team on a technical evidence base to inform policy options on energy policies. This involved regular meetings in Autumn 2022 to Spring 2023 to produce evidence that could be used in the preparation of local plans. In addition, the Council works closely with other London boroughs on the London Councils Low Carbon workstream. Officers attend monthly meetings and have contributed towards the development of a low carbon development toolkit.
- 3.13 In addition, Camden organises and chairs the London Borough Neighbourhood Planning Group. This provides an opportunity for boroughs to share experiences, advice and good practice on neighbourhood planning in London. All boroughs are invited to meetings of the Group.

### **Environment Agency**

- 3.14 The Environment Agency is the government's advisor on environmental protection and improvement, including on matters relating to water, flood risk, waste and climate change. The Environment Agency were consulted at all stages in the preparation of the Local Plan and responded at each stage. They responded to the initial 'call for views' consultation held at the start of the plan review process and those comments were considered in the preparation of the Draft Local Plan and supporting evidence. The Environment Agency's representations on the Submission Draft Local Plan confirmed that they consider the plan is sound in terms of the environmental considerations within their remit. Further detail of the Environment Agency's comments on the Plan and how they have been considered is set out in Section 4. The Council also consulted the Environment Agency on the Local Plan Sustainability Appraisal Scoping Report. The comments received informed the production of the Sustainable Appraisal of the Plan.

### **Historic England**

- 3.15 Historic England are the government's adviser on the historic environment. They were consulted at all stages in the preparation of the Local Plan and responded at each stage. Historic England responded to the initial 'call for

views' consultation held at the start of the plan review process and those comments were considered in the preparation of the Draft Local Plan. Historic England provided comments on both the Draft Local Plan and the Submission Draft Local Plan. The Council and Historic England met in September 2024 to discuss their comments on the Draft Local Plan. Further detail on their comments on the Plan and how they have been considered is set out in Section 4. The Council also consulted Historic England on the Local Plan Sustainability Appraisal Scoping Report. The comments received informed the production of the Sustainable Appraisal of the Local Plan.

### **Natural England**

- 3.16 Natural England were consulted by the Council at all stages in the preparation of the Local Plan. They responded to the consultation on the Draft Local Plan and the Proposed Submission Draft Local Plan to confirm that they had no comments. The Council also consulted Natural England on the Habitat Regulations Assessment (HRA) Screening Option of the Draft Local Plan and the Local Plan Sustainability Appraisal Scoping Report. Natural England's responses confirmed that they had no comments to make.

### **Health bodies**

- 3.17 Officers from the Council's Planning, Property and Social Care services attend the regular meetings of the Camden Local Estates Forum. Members of the Forum also include the NHS North Central London Integrated Care Board (ICB), NHS England, NHS Hospital Trusts, the London Health Urban Development Unit (HUDU), and local GP practices. The meetings provide a forum for discussion and co-ordination on the provision of health facilities in the borough and related planning and estates matters. The Council also engaged with the ICB and HUDU in the preparation of the Infrastructure Delivery Plan published alongside the Local Plan, and worked with HUDU in the preparation of the Health Impact Assessment of the Plan.
- 3.18 HUDU provided responses to consultation on the Local Plan, prepared in consultation with the ICB and NHS providers. Some individual NHS Trusts also submitted their own additional comments. Further detail is set out in Section 4.

### **Other bodies**

- 3.19 The Council consulted the Civil Aviation Authority and the Office of Rail Regulation at all stages in the preparation of the Local Plan. Neither body responded at any stage. The Marine Management Organisation have opted out from receiving planning policy consultation material from the Council. (Camden does not have any coastline or tidal waterways.)

## Statements of Common Ground

- 3.20 The National Planning Policy Framework states that, in order to demonstrate effective and on-going joint working, authorities should prepare and maintain statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address them.
- 3.21 A statement of common ground is a record of progress in planning for strategic cross-boundary matters. It documents where effective co-operation is, or is not, happening and is a way of demonstrating at examination that plans are based on effective joint working across local authority boundaries. It also forms part of the evidence to demonstrate councils have complied with the duty to cooperate. The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed.
- 3.22 The Council has produced Statements of Common Ground with its neighbouring boroughs (City of London, Barnet, Brent, Haringey, Islington, and Westminster City Council), which are updated as required. Statements of Common Ground with all neighbouring boroughs were signed in April / May 2025 and published on the Council’s website alongside the Proposed Submission Draft Camden Local Plan. Updated Statements were signed in September 2025 to support the submission of the Camden Local Plan for public examination. A Statement of Common Ground is also being prepared with the GLA.
- 3.23 Statements of Common Ground were previously signed with Barnet in December 2021; Brent in April 2020; the City of London in September 2020 and April 2024; Islington in September 2019 and Westminster in October 2019, September 2024 and May 2025.

## 4. Consideration of strategic and co-operation matters

- 4.1 This section summarises how the strategic matters identified during engagement and co-operation with relevant bodies have been considered and influenced the Proposed Submission Draft Camden Local Plan.

Strategic issue	Consideration of issue and outcomes
Meeting housing needs	The GLA's response to consultation on the Draft Local Plan requested that the Plan include a clear commitment to meet Camden’s London Plan 2021 housing target by 2029, factoring in shortfall, with clarity on how that would be achieved. They expressed concern that the draft Plan target of 11,550 homes over a 15-year plan period is significantly below the current London Plan target if annualised, but welcomed recognition in the draft Plan that the forthcoming review of the London Plan would likely change Camden's housing target. They referred to the ongoing SHLAA /

	<p>LAND4LDN work, which is part of the review of the London Plan and may identify additional sites. Camden have been working with the GLA on the SHLAA / LAND4LDN project to ensure appropriate development opportunities are identified and provide capacity-based evidence to inform the housing target for the borough in the next London Plan.</p> <p>The GLA's response to the Proposed Submission Draft Local Plan stated that, as written, the Mayor considered that the draft Plan is not in general conformity with the London Plan due to the proposed housing targets over the Plan period. The Council considers that the issues raised by the GLA are matters of soundness, rather than matters of general conformity, and that the Local Plan is in accordance with the London Plan and is sound. The Council has had subsequent discussions with the GLA about their response and is preparing a Statement of Common Ground with them to address the issues raised. Further detail is also set out in the Council's General Conformity Topic Paper and Housing Topic Paper.</p> <p>The London Borough of Islington's response to the Draft Local Plan recognised that the challenges that London boroughs face surrounding the availability and affordability of housing are more acute in inner London boroughs such as Islington and Camden. They welcomed Plan policies that seek to deliver new homes, particularly affordable homes, and a mix of dwellings, in terms of size, type and tenure. Housing is a standing item on the agenda for duty-to-co-operate meetings with neighbourhood boroughs, and housing matters were therefore discussed at the meetings set out in Appendix 1.</p> <p>As noted in paragraph 2.7 above, in May 2025 the Council wrote to all other London boroughs asking whether they were able to assist Camden in identifying a five year housing land supply of deliverable sites at examination.</p> <p>Replies were received from the following boroughs - Barnet, Havering, Islington, Lambeth, Lewisham, Newham, Redbridge, Richmond, Southwark, Tower Hamlets, Wandsworth and Waltham Forest. All confirmed that they are not in a position to assist. Brent, City of London, Haringey and Westminster have also confirmed through their Statements of Common Ground with Camden that they are not in a position to assist.</p> <p>In September 2025, the Council contacted all boroughs who did not reply to the Duty to Co-operate letter sent in May 2025, asking them to confirm their position. Replies were</p>
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	<p>received from the following boroughs - Bexley, Bromley, Enfield, Greenwich, Hillingdon, Hounslow and Merton. All confirmed that they we were not in a position to assist.</p>
<p>Affordable Housing</p>	<p>The GLA's response to consultation on the Draft Local Plan welcomed that Policy H4 reflects the London Plan strategic target that 50% of all housing is to be affordable. The response considered that the sliding scale approach was not in line with the Threshold Approach to affordable housing contributions in London Plan Policy H5. The GLA suggested that the Council should consider if there is an opportunity for the sliding scale approach to be combined with the Mayor's Threshold Approach to avoid a potential general conformity issue. The GLA's response also requested that the Plan's required level of affordable housing should be based on gross residential development rather than net increases in housing.</p> <p>The Council have had a number of meetings and communications with GLA officers to discuss how the Local Plan approach could be more closely aligned with that in the London Plan, while noting that the approach in the London Plan could itself change through the review process. Amendments, informally agreed with the GLA, were made to the wording in the Proposed Submission Draft Plan to reflect these discussions. Notwithstanding this, the GLA's response to the Proposed Submission Draft Local Plan raised some concerns about the consistency of the approach in the Local Plan with London Plan Policy H4. The Council is preparing a Statement of Common Ground with the GLA to address the issues raised.</p>
<p>Euston Opportunity Area</p>	<p>Euston is designated as an Opportunity Area in the London Plan and the Council has a dedicated development plan for the area - the Euston Area Plan (EAP), which was adopted in 2015. The Council is updating the EAP, separate to the review of the Local Plan.</p> <p>The GLA's response to the Regulation 18 Draft Local Plan recommended that the Plan provides an outline of what is expected to come forward in the Euston Area with indicative capacities and a clearer definition of the boundaries of the Opportunity Area. The Council introduced a specific policy on the Euston Area in the Submission Draft Local Plan (Policy S2). This sets out the Council's overarching approach to delivering development at Euston, which should be read in conjunction with the Euston Area Plan. The EAP sets strategic objectives and guidelines for development at Euston, and allocates sites to deliver new homes and jobs.</p>

	<p>Clarification of the boundary of the Opportunity Area has also been included in the Submission Draft Local Plan.</p> <p>The Euston Area boundary lies close to the borough boundary with Westminster. Officers from the Council's Euston team, who are preparing the update to the Euston Area Plan, have attended duty to cooperate meetings with Westminster and with other neighbouring boroughs to discuss strategic issues relating to the Euston area and the review of the EAP. In summer 2025, Euston team members held meetings with planning policy officers from the City of London, Barnet, Brent, Islington, Haringey and Westminster on matters relating to the Euston Area Plan, as set out in Appendix 1.</p>
<p>Accommodation for Gypsies and Travellers</p>	<p>The GLA's response to the Draft Local Plan stated that Plan should use site allocations to explore opportunities to meet the need for pitches for Gypsies and Travellers. The Submission Draft Local Plan allocates two sites for provision of Gypsy and Traveller accommodation. The GLA's response to the Proposed Submission Draft Local Plan stated that if the Council cannot meet the ten-year pitch target, it would be a general conformity issue. The Council has had subsequent discussions with the GLA in relation to their response and is preparing a Statement of Common Ground with them to address the issues raised.</p> <p>Camden has engaged with the GLA in the production of a London-wide Gypsy and Traveller Accommodation Needs Assessment, which it is anticipated will be published in Autumn 2025.</p> <p>Accommodation for Gypsies and Travellers is a standard agenda item at co-operation meetings held with neighbouring boroughs.</p> <p>Although the Submission Draft Local Plan allocates sites for the provision of Gypsy and Traveller accommodation it does not fully meet identified need. Therefore, as noted in paragraph 2.7 above, in May 2025 the Council wrote to all other London boroughs asking whether they were able to assist in meeting these needs.</p> <p>Replies were received from the following boroughs - Barnet, Havering, Islington, Lambeth, Lewisham, Newham, Redbridge, Richmond, Southwark, Tower Hamlets, Wandsworth, and Waltham Forest. All confirmed that they were not in a position to assist. Brent, City of London, Haringey and Westminster have confirmed through their Statements of Common Ground with Camden that they are not in a position to assist.</p>

	<p>In September 2025, the Council contacted all boroughs who did not reply to the Duty to Co-operate letter sent in May 2025, asking them to confirm their position. Replies were received from the following boroughs - Bexley, Bromly, Enfield, Greenwich, Hillingdon, Hounslow and Merton. All confirmed that they were not in a position to assist.</p>
<p>Transport</p>	<p>Transport for London’s response to the draft Local Plan welcomed that the Plan supports shifting journeys to sustainable modes, adopts the Healthy Streets Approach and exceeds London Plan requirements for car parking and cycle parking. They commended the Council for continuing to have a requirement for car-free development across the borough “which continues to set an example for other well-connected local planning authorities in London”. They also welcomed support for public transport and active travel improvements and requirements for developments to contribute to transport infrastructure. They provided a number of detailed comments and suggestions for amendments on specific policies, area plans and site allocations.</p> <p>A number of amendments were made to the Plan in response to TfL’s comments, for example in relation to car club spaces in policy T5 and Crossrail 2 safeguarding in relevant site allocations.</p> <p>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. The GLA’s response to the Proposed Submission Draft Local Plan included similar comments.</p> <p>LB Islington’s response to the Regulation 18 draft Local Plan confirmed that they share Camden’s ambition to prioritise the delivery of safe, active, healthy, affordable and sustainable transport. They recognised Camden’s promotion of a sustainable transport network and support the car-free policy, which aligns with Islington’s own policy. They noted the opportunity for a joined-up approach to promote sustainable modes along cross-boundary corridors.</p> <p>LB Barnet submitted comments on the Proposed Submission Draft Local Plan in relation to the consideration of potential cumulative transport impacts of Camden and Barnet’s site allocations (particularly those close to the shared administrative boundary). The Council has had</p>

	<p>subsequent discussions with Barnet in relation to their response and the boroughs have prepared a Statement of Common Ground which addresses the issues raised.</p> <p>The Environment Agency welcomed reference in Policy T1: Safe, Healthy and Sustainable Transport to supporting delivery of the Council’s Clean Air Action Plan and Climate Action Plan.</p>
<p>Water and flood risk</p>	<p>The Environment Agency were consulted on the Local Plan Sustainability Appraisal Scoping Report and the comments received were used in developing the approach in the Plan, in particular on water quality.</p> <p>The Environment Agency’s response to the Regulation 18 draft Local Plan was supportive of Policy CC1 requiring developments to minimise and avoiding the risk of flooding from all sources and the incorporation of sustainable drainage systems (SuDS), and Policy CC9 Water efficiency requiring residential developments to achieve a water efficiency of 110 litres of water per head per day. They suggested that the strong encouragement for proposals to achieve even higher levels of water efficiency be made a requirement. The Council considered that it was not appropriate to do this in the absence of further evidence to support the proposed approach.</p> <p>The Environment Agency also supported the reference to rainwater harvesting and requiring a grey water system for major and high/intense water use buildings. They requested the Plan promote the installation of water efficient fittings and fixtures in retrofits and refurbishments. An amendment to policy CC5 on retrofitting has been made to include reference to this.</p> <p>The Environment Agency also welcomed:</p> <ul style="list-style-type: none"> <li>• recognition of the issue of flooding through the Local Flood Risk Zone</li> <li>• Policy CC11 Flood Risk, particularly in regard to reducing flood risk; mitigating the impacts of flooding; setting out the requirements for site-specific Flood Risk Assessments; and supporting the retrofitting of flood resilience and flood resistance measures</li> <li>• that Policy CC12 Sustainable drainage and the four spatial policies require major developments to achieve greenfield run-off rates through the application of SuDS systems.</li> </ul> <p>The Environment Agency considered that the draft Local Plan is a “strong plan” with respect to groundwater and land</p>



	<p>quality issues, and noted that their previous comments have been incorporated well into the proposed policies.</p> <p>The Environment Agency’s response on the Submission Draft Local Plan confirmed their view that Policy CC9 - Water efficiency is sound and welcomed its residential development water efficiency requirement. They also requested further amendments to make the policy more robust. In addition, they welcomed amended wording in Policy CC11 - Sustainable drainage and amendments made to the supporting text of CC11 and Policy NE4 - Water Quality.</p>
<p>Tall buildings / strategic views</p>	<p>The GLA welcomed the definition of tall buildings in Part A of policy D2 as consistent with Policy D9 of the London Plan. They suggested the Council should consider whether it would be more appropriate to identify areas, rather than specific sites, as suitable for tall buildings. The Plan is clear that tall buildings outside of the identified locations will be assessed against D2, London Plan policy D9 and other relevant policies and no change was considered necessary.</p> <p>LB Islington’s response to the Draft Local Plan agreed that assessment of tall buildings needs to fully consider the criteria set out in Part C of draft Policy D2, and noted sites in each borough located in close proximity to the Islington/Camden boundary. Further engagement between the boroughs on tall buildings identified that there was missing text in Islington’s response, which was subsequently supplied. This suggested additional consideration of the relationship of tall buildings with neighbouring boroughs. In response, reference to this has been added to the wording of Policy D2.</p> <p>Islington’s response to the Proposed Submission Draft Local Plan noted that amended Policy D2 was amended in response to comments from Islington to include the consideration of the relationship between the building and neighbouring boroughs where tall buildings are proposed close to the borough boundary. It requested a further minor change to added reference in the policy to heritage assets in neighbouring boroughs.</p> <p>Historic England welcomed the introduction of a specific tall buildings policy. They considered that a reference to avoiding any adverse impacts on the historic environment should be included within the policy itself. In response a criterion relating to the historic environment has been added to Policy D2.</p>

	<p>Historic England also asked for additional clarity on the analysis in the Building Heights Study and the effects on heritage significance and historic character. The Council and Historic England had a further meeting to discuss the Local Plan in September 2024. Subsequently Historic England provided further comments. These were considered by the Council and relevant amendments made.</p> <p>Historic England’s response to the Proposed Submission Draft Local Plan welcomed the amendments made to the Plan as a result of their comments and subsequent discussions, including those made to policy D2 on tall buildings.</p>
Heritage	<p>Historic England’s response to the Draft Local Plan considered that there was much to welcome in its approach to the management of change in the built environment and its potential impacts on the heritage of the borough. In particular, they welcomed the commitment through the strategic objective to promote high quality and contextually successful design of new development.</p> <p>They supported the overall aims of policy D5 Heritage and the approach to the range of designated heritage assets within the borough. They considered it could do more to set out a positive approach to how change affecting the local historic environment will be managed, for example in terms of promoting heritage-led regeneration. They provided detailed comments on parts the draft Plan that they considered could be further strengthened and clarified. In particular, they considered there could be a greater alignment with the NPPF in its approach to the historic environment and greater emphasis on heritage significance. The Council made a number of amendments to the Plan in response to Historic England’s comments; for example, to ensure alignment with the NPPF and adding reference to heritage-led regeneration.</p> <p>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.</p> <p>Historic England were also consulted on the Local Plan Sustainability Appraisal Scoping Report and, in response, additional criteria were added into the SA objective for Heritage.</p>

<p>Waste</p>	<p>As noted in paragraph 3.4 above, Camden worked jointly with the London Boroughs of Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest to prepare the North London Waste Plan, which was adopted in 2022.</p> <p>The Environment Agency’s comments on the Draft Local Plan welcomed the safeguarding of Camden’s Regis Road recycling centre. They requested that Policy CC3 - Circular economy and reduction of waste provided reference to the relationship with the North London Waste Plan as far as provision of waste capacity is concerned and the targets set in the London Plan. Additional wording was added in the Submission Draft Local Plan in response to this comment. Their response on the Submission Draft Local Plan welcomed changes made to Policy CC3.</p>
<p>Climate Change</p>	<p>The Environment Agency’s response on the Draft Local Plan supported the link to delivering the actions identified in the Council’s Climate Action Plan, Policy CC4 - Minimising Carbon Emissions, the requirement for developments to submit whole life carbon assessments, and also Policy CC8: Overheating and cooling.</p> <p>Their response on the Submission Draft Local Plan welcomed changes made to Policy CC1 - Responding to climate change, and suggested minor amendments to Policy CC6: Energy reduction in new buildings and Policy CC8: Overheating and cooling.</p> <p>Historic England welcomed the emphasis in the draft Plan on addressing issues stemming from changing climate, and in particular the emphasis on the refurbishment and retrofitting of existing buildings. They also welcomed policy CC5 relating to energy reduction in existing buildings, and provided detailed suggestions on how the approach can be further strengthened. Amendments to Policy CC5 were made in the Submission Draft Plan in response to Historic England’s comments.</p> <p>LB Islington’s response to the Draft Local Plan welcomed the focus on reducing carbon emissions and was supportive of policies that seek further expansion of infrastructure which helps to deliver this, such as Decentralised Energy Networks. It also supported the Plan’s approach to climate change mitigation, including prioritising of repurposing, refurbishing and re-using existing buildings over demolition, and employing circular economy principles.</p>
<p>Site allocations</p>	<p>As noted in paragraph 2.7 above, the Council carried out two consultation exercises on a Draft Site Allocations Local Plan (SALP) before the decision was made to incorporate</p>

	<p>site allocations within an updated local plan. The following prescribed bodies responded to the initial consultation on the Draft SALP - Camden NHS Clinical Commissioning Group, Greater London Authority, Highways England, Historic England, Natural England, Transport for London.</p> <p>The Environment Agency, Historic England, and Transport for London responded during the second consultation period on the SALP. (The consultation document was the same on both occasions.) All responses were considered and they informed the site allocations included in the Draft Local Plan. The comments received on the SALP were generally on matters of detail rather than strategic issues.</p> <p>The GLA's response to the Draft Local Plan commented on sites with significant industrial floorspace. They considered that the allocation for the Murphy Site (C3), a designated Industrial Area equivalent to the London Plan Local Strategic Industrial Site (LSIS) designation, should set out more detail on the amount of industrial space currently on site and the amount expected post-development in order to maintain the area as a viable industrial location. Similar comments were made in the GLA's response to the Proposed Submission Draft Local Plan. The allocation for this site in the Submission Draft Plan requires development to intensify industrial provision to increase, or at least maintain, capacity. It was not considered appropriate to set out a detailed floorspace figures.</p> <p>The GLA also requested that industrial floorspace, including B8 uses, should be retained through co-location at Regis Road (C2) and Camley Street (S4 and S5). The allocations for these sites in the Submission Draft Local Plan require development to intensify industrial / employment floorspace, with no net loss.</p> <p>Transport for London's response to the Draft Plan encouraged the Council to consider how the policies and site allocations in the Plan could help deliver Camden Town station capacity upgrade, which is a project of strategic importance to TfL. Site allocation C17 - Camden Town over-station development notes TFL's ambitions for the site. Capacity upgrade at Camden Town Underground Station is included in Policy C1 as infrastructure priority for the Central Camden area.</p> <p>LB Islington's response to the Draft Local Plan noted the site allocations near to the borough boundary in South Camden and stated they would welcome continued engagement in</p>
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	<p>the future planning of these areas / sites to consider cross-boundary impacts.</p> <p>LB Barnet submitted comments on the Proposed Submission Draft Local Plan, in particular in relation to any potential transport impacts on Barnet from development at sites relatively near the borough boundary.</p> <p>The Environment Agency provided detailed comments on environmental constraints on individual sites. Amendments to the Plan were made as appropriate. They did not submit any further comments on site allocations in their response to the Submission Draft Local Plan.</p> <p>HUDU's response on the Draft Local Plan provided comments on a number of sites in relation to health matters and provision, in particular on the need for health-related provision or contributions to again be secured where there are modifications to schemes with permission or new proposals submitted. Their response to the Proposed Submission Draft Local Plan set out provided some further comments on a small number of sites.</p> <p>Historic England's response to the Draft Local Plan broadly welcomed the inclusion of detail within site allocations relating to heritage assets that may be affected by development proposed. They provided specific comments relating to a number of the site allocations in the Draft Plan, in particular regarding clarification of how building heights had been determined, particularly in relation to those with potential effects on heritage assets. The Council and Historic England had a further meeting to discuss the Local Plan in September 2024. Subsequently Historic England provided further comments on some site allocations. Amendments to the Plan in response to Historic England's comments and subsequent discussion were made as appropriate.</p> <p>Historic England's response to the Proposed Submission Draft Local Plan welcomed the amendments that were made to site allocations as a result of their previous comments and discussions. They provided limited additional comments on three site allocations, intended to add clarity and certainty.</p>
<p>Natural environment</p>	<p>The Environment Agency's response to the Draft Local Plan welcomed that the inter-related nature of different aspects of a development is recognised in Policy NE1: Natural Environment, and the potential for associated delivery efficiencies that this brings. They suggested amendments to Policy NE2: Biodiversity to improve and strengthen this policy. Their response on the Submission Draft Local Plan</p>

	<p>did not add any additional comments on policies on the natural environment.</p> <p>LB Islington’s response to the Draft Local Plan was supportive of policies that conserve and enhance existing open spaces and local green spaces, and those which seek to maximise opportunities for the creation of new green space, urban greening and tree planting. Islington also supported the policy on biodiversity and welcomed the safeguarding of protected and priority habitats and species and sites and features of biodiversity value. They noted that the delivery of wildlife corridors and wider green infrastructure networks should be treated as cross-boundary issues, and looked forward to working with Camden to feed into the Greater London Authority’s Local Nature Recovery Strategy to consider these issues at a strategic level.</p> <p>The City of London Corporation responded to the consultation on the Submission Draft Local Plan to support the draft Plan proposal for a Camden Nature Corridor.</p> <p>Natural England did not comment on the Draft Local Plan or the Sustainability Appraisal, and confirmed that they had no comments on the Habitats Regulations Assessment of the Plan.</p>
Health and wellbeing	<p>The London Healthy Urban Development Unit’s (HUDU) response to the Draft Local Plan, prepared in consultation with the North Central London ICB and NHS providers, 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. They also provided a limited number of comments on the Proposed Submission Local Plan. As noted in paragraph 3.17 above, the Council worked with HUDU in the preparation of the Health Impact Assessment of the Plan.</p>
Economy / Employment	<p>The GLA’s response to the Draft Local Plan stated that Policy IE3 - Industry is broadly in line with London Plan Policies E4 and E7. They considered that the Plan should be clearer on how much additional industrial land is required in order to meet demand in the borough over the plan period, given the low levels of vacancy, and how this will be delivered. The Council does not consider it is practical to set a target for industrial space given the highly constrained nature of the Borough, lack of sites to provide additional capacity and the critical need for the Local Plan to</p>

	<p>demonstrate that the Borough is able to meet its housing target. The Local Plan therefore focusses upon safeguarding and intensifying existing sites. The main opportunities to provide industrial space are on existing key employment locations identified as site allocations in the Local Plan.</p> <p>The GLA requested that Camden commit to producing a monitoring framework for industrial capacity in the borough to help inform decision making, and that the Plan should note the significance of Camden’s location in the Central Services Area. The Council collects information and reports on changes in employment land and floorspace through its Authority Monitoring Report. Reference to the Central Services Area has been included in the Submission Draft Local Plan.</p> <p>The GLA considered that the Plan should reflect the London Plan’s focus of office into Central Activity Zone (CAZ), town centres and Opportunity Areas, in order to take advantage of existing infrastructure and connectivity, and avoid allocations outside of these areas. The Local Plan supports the CAZ as the main focus for employment development in Camden, although it is considered appropriate that development in some locations outside of the CAZ, Opportunity Areas and town centres (for example in the Knowledge Quarter) also include office space as part of mixed-use development.</p> <p>LB Islington’s response to the Draft Local Plan expressed support for policies that seek to protect and promote employment floorspace and, in particular, the delivery of office floorspace within the CAZ and the Knowledge Quarter around King’s Cross. Islington were also supportive of further affordable workspace in the area to support SME businesses reflecting their own affordable workspace policy (albeit noting that it operates differently), and the Plan’s approach to directing retail and leisure development to designated centres.</p>
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## 5. Conclusion

- 5.1 This Duty to Co-operate Statement demonstrates how the London Borough of Camden has fulfilled the duty to co-operate in producing the Proposed Submission Draft Camden Local Plan consistent with Section 110 of the Localism Act 2011, Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) and Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

- 5.2 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.
- 5.3 This Statement, the Local Plan Consultation Statement, and Statements of Common Ground, will be used at the public examination of the Proposed Submission Draft Local Plan to demonstrate that it has been based on effective cross-boundary joint working.



## Appendix 1 - Duty to co-operate and inter-borough meetings

### Duty to co-operate meetings

#### City of London

Date of meeting	Key strategic matters discussed
15 November 2018	<ul style="list-style-type: none"> <li>○ Local Plan update - City - Regulation 18 plan; Camden - site allocations initial work; supplementary planning guidance updates</li> <li>○ London Plan EIP</li> <li>○ Housing matters - overall need and London Plan target; Housing Delivery Test; affordable housing; Gypsy and Traveller accommodation; self-build register; other specialist housing needs; empty homes; short term lets</li> <li>○ CAZ Strategic functions – offices, culture, tourism</li> <li>○ Neighbourhood Planning</li> <li>○ Article 4 Directions</li> <li>○ Strategic views - London View Management Framework</li> <li>○ Other cross boundary issues - Holborn; Hatton Garden</li> <li>○ Statement of Common Ground</li> </ul>
23 June 2020	<ul style="list-style-type: none"> <li>○ Local Plan update - City - local plan consultation; Camden - Site Allocations Local Plan second Regulation 18 consultation; North London Waste Plan examination; Euston Area Plan update; Holborn Vision area framework consultation</li> <li>○ Housing - housing need; London Plan target; 5-year land supply; housing in CAZ - London Plan and council policies; Gypsy and Traveller accommodation; self-build</li> <li>○ Policies on offices, climate change, circular economy, urban greening</li> <li>○ Culture Mile; Holborn; Legal Quarter; Hatton Garden</li> <li>○ Statement of Common Ground</li> </ul>
14 July 2021	<ul style="list-style-type: none"> <li>○ Local Plan update - City - local plan consultation; Camden - Site Allocations Local Plan Regulation 18 consultation</li> <li>○ London Plan</li> <li>○ Planning reforms - Class E, PD, design codes</li> <li>○ Housing - delivery and land supply: Gypsy and Traveller accommodation; first homes; self-build</li> <li>○ Neighbourhood Planning</li> <li>○ Article 4 Directions</li> <li>○ Strategic views - London View Management Framework</li> <li>○ Other cross boundary issues - Knowledge Quarter and life sciences; City Culture Mile; Smithfield Market</li> <li>○ Statement of Common Ground</li> </ul>

<p>21 October 2022</p>	<ul style="list-style-type: none"> <li>○ Local Plan update - City - Regulation 19 consultation, Whole Life Carbon Planning Advice Note; Camden - Local Plan review / Site Allocations Local Plan; Euston Area Plan review; North London Waste Plan adoption</li> <li>○ Tall buildings policies</li> <li>○ Housing - Housing Delivery Test; housing targets beyond the London Plan period</li> <li>○ Digital planning</li> <li>○ Article 4 Directions</li> </ul>
<p>24 November 2023</p>	<ul style="list-style-type: none"> <li>○ Local Plan update - City - local plan review progress; Camden - Regulation 18 draft Local Plan to Cabinet</li> <li>○ Housing - delivery and land supply; London Plan target; student housing; co-living; Gypsy and Traveller accommodation</li> <li>○ Approach to offices, tall buildings, culture, climate change / sustainability</li> <li>○ Smithfield / Barbican; Holborn Tunnels</li> <li>○ Article 4 Directions</li> <li>○ Statement of Common Ground</li> </ul>
<p>23 May 2024</p>	<ul style="list-style-type: none"> <li>○ Local Plan update - City Plan Regulation 19 consultation; Sustainability SPD consultation; Camden Local Plan Regulation 18 consultation; Euston Area Plan review</li> <li>○ Housing - housing targets and delivery; Camden to write to other boroughs about unmet needs under the duty to co-operate</li> <li>○ Approaches to tall buildings and retrofit</li> <li>○ Statement of Common Ground</li> <li>○ Use of Commonplace platform</li> </ul>
<p>15 July 2025</p>	<ul style="list-style-type: none"> <li>○ Euston Area Plan meeting</li> <li>○ Strategic views; land use; commercial floorspace</li> <li>○</li> </ul>
<p>31 July 2025</p>	<ul style="list-style-type: none"> <li>○ Local Plan update - City Plan Regulation 19 examination; Camden Local Plan Regulation 19 consultation; Euston Area Plan</li> <li>○ Housing - housing targets; Camden letter to other boroughs under the duty to co-operate re Gypsy and Traveller accommodation and 5 year land supply; issues with the London-wide SHLAA</li> <li>○ Towards London Plan consultation</li> <li>○ Proposal for an additional strategic view from Waterlow Park to St Paul's Cathedral</li> <li>○ GLA approach to employment sites and density</li> <li>○ Neighbourhood planning</li> <li>○ Statement of Common Ground</li> </ul>

**London Borough of Barnet**

<b>Date of meeting</b>	<b>Key strategic matters discussed</b>
31 January 2019	<ul style="list-style-type: none"> <li>○ Local Plan update - Barnet Regulation 18 draft Local Plan preparation; Camden - supplementary planning guidance update; initial work on site allocations plan</li> <li>○ Cricklewood growth area</li> <li>○ London Plan EIP attendance</li> <li>○ Housing - housing delivery test; self-build; Gypsy and Traveller accommodation need</li> <li>○ Neighbourhood planning</li> <li>○ Article 4 Directions</li> <li>○ North London Waste Plan Submission draft</li> </ul>
28 April 2021	<ul style="list-style-type: none"> <li>○ Local Plan update - Barnet Local Plan Regulation 18 consultation; Camden - Site Allocations Local Plan Regulation 18 consultation; supplementary planning guidance; Euston Area Plan update</li> <li>○ North London Waste Plan progress</li> <li>○ Housing - housing delivery; 5 year land supply, Gypsy and Traveller accommodation; First homes; affordable home ownership; specialist housing; basements</li> <li>○ London Plan</li> <li>○ Planning white paper consultation</li> <li>○ Neighbourhood planning</li> <li>○ Class E Article 4 Directions</li> <li>○ Cricklewood growth area</li> <li>○ Online / digital consultation methods</li> <li>○ Statement of Common Ground</li> </ul>
20 September 2023	<ul style="list-style-type: none"> <li>○ Local Plan update - Barnet local plan examination progress; Camden Local Plan review</li> <li>○ Housing - housing policies; Gypsy and Traveller accommodation; first homes; buy to rent; older people's homes; HMOs</li> <li>○ Permitted development rights / Article 4 Directions</li> <li>○ Neighbourhood planning</li> <li>○ London Datahub issues</li> </ul>
4 July 2024	<ul style="list-style-type: none"> <li>○ Local Plan update - Barnet local plan examination - main modifications consultation; Camden Local Plan Regulation 18 consultation; Euston Area Plan review</li> <li>○ Camden Gypsy and Traveller accommodation site identification work</li> <li>○ Housing - housing supply; housing targets; Gypsy and Traveller accommodation; Camden to write to other boroughs about unmet needs under the duty to co-operate</li> <li>○ Cricklewood</li> <li>○ West London Orbital</li> </ul>

	<ul style="list-style-type: none"> <li>○ Neighbourhood planning</li> <li>○ Monitoring</li> <li>○ Statement of Common Ground</li> </ul>
14 July 2025	<ul style="list-style-type: none"> <li>○ Euston Area Plan meeting</li> <li>○ Strategic views; transport; traffic and public transport impact; housing</li> </ul>
3 September 2025	<ul style="list-style-type: none"> <li>○ Local Plans - Camden Local Plan Regulation 19 consultation and responses; Barnet representations on the Camden Local Plan; Barnet Local Plan adoption; supplementary planning documents; early local plan review</li> <li>○ Housing - Housing targets; 5 year land supply; student housing; Gypsy and Travellers accommodation</li> <li>○ LAND4LDN</li> <li>○ Planning reforms</li> <li>○ A5 corridor</li> <li>○ Neighbourhood planning</li> <li>○ Statement of Common Ground</li> </ul>

### London Borough of Brent

<b>Date of meeting</b>	<b>Key strategic matters discussed</b>
16 May 2018	<p>Brent, Westminster, Camden meeting</p> <ul style="list-style-type: none"> <li>○ Local Plans - Westminster Local Plan Regulation 19 consultation; Brent Local Plan Regulation 18; Camden site allocations review; update to supplementary guidance</li> <li>○ Statement of Common Ground</li> <li>○ Planning for waste</li> <li>○ Flooding</li> <li>○ Neighbourhood planning</li> <li>○ Housing - Housing targets; affordable home ownership; affordable housing; empty homes; self-build</li> <li>○ Article 4 Directions</li> <li>○ GDPR</li> </ul>
7 July 2021	<ul style="list-style-type: none"> <li>○ Local Plan update - Brent - Local Plan examination; Proposed Modification consultation; Camden - Site Allocations Local Plan Regulation 18 consultation</li> <li>○ Housing - housing delivery; 5 year land supply; Gypsy and Traveller accommodation; shared ownership / intermediate rent; First Homes; compact living; self-build</li> <li>○ Neighbourhood Planning - Kilburn Neighbourhood Forum</li> <li>○ Article 4 Directions</li> <li>○ Kilburn High Road joint borough project</li> </ul>

	<ul style="list-style-type: none"> <li>○ Statement of common ground</li> </ul>
19 April 2023	<ul style="list-style-type: none"> <li>○ Local Plan update - Brent Local Plan examination and adoption; Camden Site Allocations Local Plan Regulation 18 consultation; Local Plan review; Euston Area Plan</li> <li>○ Housing - housing delivery; student accommodation; build to rent; compact living; Gypsy and Traveller accommodation</li> <li>○ Neighbourhood Plans</li> <li>○ Article 4 Directions</li> <li>○ One Kilburn</li> </ul>
16 May 2024	<ul style="list-style-type: none"> <li>○ Local Plan update - Camden draft Local Plan Regulation 18 consultation; Euston Area Plan</li> <li>○ Housing - housing policies and targets; 5 year land supply; Housing delivery test; Gypsy and Traveller accommodation; Camden to write to other boroughs under the duty to co-operate about unmet needs; self-build; student housing</li> <li>○ London Plan review</li> <li>○ Characterisation studies</li> <li>○ Neighbourhood Planning; Kilburn Neighbourhood Plan Regulation 14</li> <li>○ Cricklewood</li> <li>○ Statement of Common Ground</li> </ul>
17 July 2025	<ul style="list-style-type: none"> <li>○ Euston Area Plan meeting</li> <li>○ Connectivity with Old Oak Common and Brent</li> </ul>
4 August 2025	<ul style="list-style-type: none"> <li>○ Local Plan update - Camden Local Plan Regulation 19 consultation; Euston Area Plan; Brent local plan review potential timetable</li> <li>○ Housing - housing delivery; Gypsy and Traveller accommodation; Camden letter to other boroughs under the duty to co-operate re Gypsy and Traveller accommodation and 5 year land supply; intermediate housing; student accommodation; co-living</li> <li>○ Towards London Plan consultation</li> <li>○ National Development Management Policies</li> <li>○ Neighbourhood planning - Kilburn NP examination</li> <li>○ Kilburn High Road</li> <li>○ Gambling establishments</li> <li>○ Statement of Common Ground</li> </ul>

**London Borough of Haringey**

<b>Date of meeting</b>	<b>Key strategic matters discussed</b>
2 August 2018	<ul style="list-style-type: none"> <li>○ Local Plan update - Camden update of supplementary guidance; Site Allocations review; Haringey - Wood Green Area Action Plan (AAP)</li> <li>○ London Plan review</li> <li>○ Housing - housing targets; housing delivery; affordable housing; affordable home ownership; temporary accommodation; self-build; Gypsy and Traveller accommodation; housing for older people; student housing</li> <li>○ Neighbourhood planning progress update; Highgate Neighbourhood Plan</li> <li>○ Article 4 Directions</li> <li>○ Highgate School</li> <li>○ Highgate Newtown Community Centre</li> <li>○ Statement of Common Ground</li> </ul>
20 September 2019	<ul style="list-style-type: none"> <li>○ Local Plan update - Camden Site Allocations review; planning frameworks for growth areas; Haringey Wood Green AAP; North London Waste Plan</li> <li>○ NPPF</li> <li>○ London Plan</li> <li>○ Housing - housing delivery; 5 year land supply; Gypsy and Traveller accommodation; self-build; empty homes</li> <li>○ Neighbourhood Planning</li> <li>○ Article 4 Directions</li> <li>○ Community Infrastructure Levy</li> <li>○ Highgate School SPD</li> <li>○ Proposed TfL cycle route between Tottenham Hale and Camden</li> <li>○ Statement of Common Ground</li> </ul>
14 April 2021	<ul style="list-style-type: none"> <li>○ Local Plan update - Camden Draft Site Allocations Local Plan Regulation 18 consultation</li> <li>○ Haringey Local Plan Issues and options consultation; local plan evidence</li> <li>○ Housing - housing delivery and land supply; Gypsy and Traveller accommodation; First homes; affordable home ownership; self-build</li> <li>○ Neighbourhood planning update</li> <li>○ Article 4 Directions</li> <li>○ Highgate School SPD</li> <li>○ Statement of Common Ground</li> </ul>
14 February 2023	<ul style="list-style-type: none"> <li>○ Local Plan update - Camden Local Plan review Regulation 18 consultation; Site Allocations Local Plan</li> <li>○ Haringey Local Plan Regulation 18</li> </ul>

	<ul style="list-style-type: none"> <li>○ Housing - housing targets; Gypsy and Traveller accommodation; starter homes; social housing</li> <li>○ Design codes; characterisation studies</li> <li>○ Neighbourhood planning; Highgate Neighbourhood Forum</li> <li>○ Highgate School SPD / development</li> </ul>
20 June 2024	<ul style="list-style-type: none"> <li>○ Local Plan update - Camden Draft Local Plan consultation; Euston Area Plan review; Haringey local plan review</li> <li>○ Housing - housing targets; Gypsy and Traveller accommodation; affordable housing; Camden letter to other boroughs under the duty to co-operate re Gypsy and Travellers accommodation and 5 year land supply; co-living; self-build</li> <li>○ Affordable workspace</li> <li>○ Climate change policy; retrofit</li> <li>○ Neighbourhood planning; Highgate Neighbourhood Plan</li> <li>○ Statement of Common Ground</li> <li>○ Haringey Infrastructure Delivery Plan</li> </ul>
17 July 2025	<ul style="list-style-type: none"> <li>○ Euston Area Plan meeting</li> <li>○ Strategic views</li> </ul>
21 July 2025	<ul style="list-style-type: none"> <li>○ Local Plans - Haringey Regulation 18 Local Plan; Camden Proposed Submission Draft Local Plan consultation</li> <li>○ Housing - Housing delivery; student housing; Gypsy and Traveller accommodation</li> <li>○ Neighbourhood planning; Camden duty to co-operate letter to boroughs</li> <li>○ Infrastructure Delivery Plans</li> <li>○ Proposed new strategic view from Waterlow Park</li> <li>○ Statement of Common Ground</li> </ul>

### London Borough of Islington

<b>Date of meeting</b>	<b>Key strategic matters discussed</b>
26 April 2018	<ul style="list-style-type: none"> <li>○ Neighbourhood planning; Mount Pleasant Neighbourhood Plan</li> <li>○ Local Plans - Islington Local Plan review; Camden site allocations review</li> <li>○ London Plan consultation</li> <li>○ Housing - housing targets; affordable housing; build to rent; student accommodation; housing for older people; self-build; empty homes</li> <li>○ Statements of common ground</li> <li>○ Article 4 Directions</li> </ul>

<p>13 March 2019</p>	<ul style="list-style-type: none"> <li>○ Local Plans - Islington Local Plan Regulation 18 consultation; Camden site allocations plan; North London Waste Plan</li> <li>○ London Plan; housing targets</li> <li>○ Housing - housing delivery; affordable housing; self-build; Gypsy and Traveller accommodation</li> <li>○ Neighbourhood planning; Mount Pleasant Neighbourhood Plan</li> <li>○ Article 4 Directions</li> <li>○ Borough boundary at King's Cross Triangle site</li> <li>○ Tall buildings</li> <li>○ Knowledge Quarter</li> <li>○ Statement of Common Ground</li> </ul>
<p>3 March 2021</p>	<ul style="list-style-type: none"> <li>○ Local Plans - Islington Local Plan Regulation 19 consultation, submission and examination; Camden Site Allocation Local Plan consultation; updates to supplementary guidance.</li> <li>○ London Plan</li> <li>○ Housing - housing targets; land supply; Gypsy and Traveller accommodation; First homes and affordable home ownership; self-build</li> <li>○ Planning reforms - design codes</li> <li>○ Neighbourhood Planning</li> <li>○ Article 4 Directions</li> <li>○ Offices - covid impact</li> <li>○ Statement of Common Ground</li> </ul>
<p>9 June 2022</p>	<ul style="list-style-type: none"> <li>○ Local Plans - Islington Local Plan modifications; Draft Camden Site Allocations Local Plan; Local Plan review; Euston Area Plan</li> <li>○ Housing land supply; Gypsy and Traveller accommodation; housing older people; student accommodation; self-build</li> <li>○ Planning reforms</li> <li>○ Neighbourhood planning</li> <li>○ Article 4 Directions</li> <li>○ St Pancras Hospital development</li> <li>○ Statement of Common Ground</li> </ul>
<p>September 2023</p>	<ul style="list-style-type: none"> <li>○ Local Plans - Islington Local Plan examination and Inspector's report; Camden Local Plan review; Euston Area Plan review</li> <li>○ Housing - housing delivery</li> <li>○ Neighbourhood planning</li> <li>○ Article 4 Directions</li> </ul>
<p>11 July 2024</p>	<ul style="list-style-type: none"> <li>○ Local Plans - Islington Local Plan adoption; Gypsy and Traveller accommodation early review; Camden Draft Local Plan consultation; Euston Area Plan review</li> </ul>



	<ul style="list-style-type: none"> <li>○ Housing - housing targets; housing delivery; land supply; Gypsy and Traveller accommodation; Camden letter to other boroughs under the duty to co-operate re Gypsy and Travellers accommodation and 5 year land supply; larger HMOs; affordable housing; student housing; accommodation for older people and other specialist housing; co-living</li> <li>○ Neighbourhood planning</li> <li>○ King's Cross Triangle site</li> <li>○ Statement of Common Ground</li> </ul>
19 June 2025	<ul style="list-style-type: none"> <li>○ Local Plans - Camden Local Plan Regulation 19 consultation; Euston Area Plan review</li> <li>○ Islington Gypsies and Traveller local plan review; updates to supplementary planning guidance</li> <li>○ Article 4 Directions</li> <li>○ Housing - Housing delivery and land supply; Gypsy and Travellers accommodation; affordable housing delivery</li> <li>○ London Plan - Towards a new London Plan; LAND4LDN</li> <li>○ Neighbourhood planning</li> <li>○ Statement of Common Ground</li> </ul>
17 July 2025	<ul style="list-style-type: none"> <li>○ Euston Area Plan meeting</li> <li>○ Land use; Economic Impact Assessment</li> </ul>

### Westminster City Council

<b>Date of meeting</b>	<b>Key strategic matters discussed</b>
16 May 2018	<p>Westminster, Brent, Camden meeting</p> <ul style="list-style-type: none"> <li>○ Local Plans - Westminster City Plan Regulation 19 consultation; Brent Local Plan Regulation 18; Camden site allocations review; update to supplementary guidance</li> <li>○ Statement of Common Ground</li> <li>○ Planning for waste</li> <li>○ Approach to flooding</li> <li>○ Neighbourhood planning</li> <li>○ Housing - Housing targets; affordable home ownership; affordable housing; empty homes; self-build</li> <li>○ Article 4 Directions</li> <li>○ GDPR</li> </ul>
13 December 2018	<ul style="list-style-type: none"> <li>○ Local Plans - Westminster City Plan Regulation 19 consultation; Camden Ste allocations Local Plan; updates to supplementary guidance</li> <li>○ Statement of Common Ground</li> </ul>

	<ul style="list-style-type: none"> <li>○ Housing - housing targets; 5 year land supply; affordable housing; empty homes; self-build; student housing; Gypsy and Traveller accommodation</li> <li>○ Tottenham Court Road Opportunity Area, West End and Soho</li> <li>○ Waste planning</li> <li>○ Green infrastructure; district heating; parking</li> <li>○ Neighbourhood planning</li> <li>○ London Plan Examination in Public</li> <li>○ Article 4 Directions</li> <li>○ Community Infrastructure Levy</li> <li>○ Infrastructure delivery plans</li> </ul>
17 March 2021	<ul style="list-style-type: none"> <li>○ Local Plans - Westminster City Plan examination and main modifications; Camden Ste Allocations Local Plan; supplementary guidance updates</li> <li>○ Use Class E</li> <li>○ Approach to flooding</li> <li>○ London Plan</li> <li>○ Article 4 Directions</li> <li>○ Design codes</li> <li>○ Housing - Housing delivery; Gypsy and Traveller accommodation; First homes and affordable home ownership; self-build; student housing; specialist housing</li> <li>○ Neighbourhood planning</li> <li>○ Tottenham Court Road Opportunity Area</li> <li>○ Offices - covid impact</li> <li>○ Statement of Common Ground</li> </ul>
11 September 2023	<ul style="list-style-type: none"> <li>○ Local Plans - Westminster City Plan partial review; Camden Local Plan review; Euston Area Plan Regulation 18 consultation</li> <li>○ Housing - affordable housing; specialist housing</li> <li>○ Retrofitting</li> <li>○ Levelling Up and Regeneration Bill consultation</li> <li>○ Neighbourhood Planning</li> <li>○ Statement of Common Ground</li> </ul>
20 June 2024	<ul style="list-style-type: none"> <li>○ Local Plans - Westminster City Plan partial review Regulation 19; Camden Local Plan Regulation 18 consultation; Euston Area Plan further Regulation 18 consultation</li> <li>○ Housing - Housing targets and delivery; Gypsy and Traveller accommodation; Camden letter to other boroughs under the duty to co-operate re Gypsy and Traveller accommodation and 5 year land supply; intermediate housing; self-build; first homes</li> <li>○ Neighbourhood planning</li> <li>○ Statement of Common Ground</li> </ul>
17 July 2025	<ul style="list-style-type: none"> <li>○ Euston Area Plan meeting</li> <li>○ Strategic views</li> </ul>

3 September 2025	<ul style="list-style-type: none"> <li>○ Local Plans - Camden Local Plan Regulation 19 consultation and responses; submission for examination; Westminster partial Local Plan review examination; full plan review initial engagement</li> <li>○ Housing - Housing targets; 5 year land supply; student housing; Gypsy and Travellers accommodation</li> <li>○ Neighbourhood planning</li> <li>○ Oxford Street Mayoral Development Corporation</li> <li>○ Tottenham Court Road Opportunity Area</li> <li>○ Statement of Common Ground</li> </ul>

### Greater London Authority

<b>Date of meeting</b>	<b>Key strategic matters discussed</b>
12 May 2021	<ul style="list-style-type: none"> <li>○ Camden Site Allocations Local Plan - industrial land and capacity; Use Class E; Central Activities Zone; first homes; student housing; Gypsy and Travellers accommodation; tall buildings</li> <li>○ Statement of Common Ground</li> </ul>
24 November 2022	<ul style="list-style-type: none"> <li>○ Camden Local Plan review housing target</li> </ul>
25 January 2023	<ul style="list-style-type: none"> <li>○ Gypsy and Travellers accommodation</li> <li>○ Housing supply</li> <li>○ Housing target beyond London Plan period</li> <li>○ Tall buildings</li> </ul>
18 May 2023	<ul style="list-style-type: none"> <li>○ Camden Local Plan housing policies - housing delivery; affordable housing; build to rent; housing for older people; student housing</li> </ul>
15 June 2023	<ul style="list-style-type: none"> <li>○ Camden Local Plan tall building approach; Camden Building Heights Study</li> </ul>
23 February 2024	<ul style="list-style-type: none"> <li>○ Camden Draft New Local Plan - affordable housing; Gypsy and Traveller accommodation; housing target; industrial land; tall buildings</li> </ul>
14 August 2024	<ul style="list-style-type: none"> <li>○ Housing - housing targets; housing delivery; student housing</li> <li>○ Metropolitan Open Land</li> <li>○ Emerging major development schemes</li> </ul>
19 December 2024	<ul style="list-style-type: none"> <li>○ Camden Local Plan housing target</li> <li>○ London Plan review</li> <li>○ Affordable housing</li> <li>○ Gypsy and Traveller accommodation</li> </ul>

10 February 2025	<ul style="list-style-type: none"> <li>Camden Local Plan emerging housing policies; affordable housing</li> </ul>
6 June 2025	<ul style="list-style-type: none"> <li>GLA response to Proposed Submission Draft Camden Local Plan (Regulation 19) - general conformity; housing target; affordable housing; Gypsy and Traveller accommodation</li> </ul>
4 September 2025	<ul style="list-style-type: none"> <li>GLA response to Proposed Submission Draft Camden Local Plan (Regulation 19) - general conformity; housing target; Gypsy and Traveller accommodation; Statement of Common Ground</li> </ul>

### Other inter-borough meetings

<b>Association of London Borough Planning Officers (ALBPO)</b>	26 September 2017	4 May 2021
	26 January 2018	12 October 2021
	6 March 2018	8 November 2022
	1 May 2018	14 March 2023
	3 July 2018	9 May 2023
	18 September 2018	7 November 2023
	13 November 2018	16 January 2024
	25 January 2019	7 May 2024
	4 April 2019	24 September 2024
	16 July 2019	5 November 2024
	17 September 2019	11 March 2025
	12 November 2019	6 May 2025
	31 March 2020	13 July 2025
	9 March 2021	
<b>London Boroughs Infrastructure Network</b>	26 May 2022	21 March 2024
	7 Sept 2022	4 June 2024
	9 December 2022	24 January 2025
	16 May 2023	16 May 2025
	6 October 2023	
<b>Central London Forward Planning Officer Group</b>	18 March 2021	6 July 2023
	21 April 2021	21 February 2024
	17 June 2021	12 September 2024
	14 October 2021	7 November 2024
	3 November 2022	6 January 2025
	12 January 2023	17 February 2025
	9 March 2023	14 April 2025
	4 May 2023	16 May 2025
		24 June 2025

**Appendix 2 - LB Camden letter to all London boroughs requesting assistance in meeting the accommodation needs of Gypsies and Travellers and identifying a five year housing land supply**



Via email

Planning Policy  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE  
camden.gov.uk

23 May 2025

To whom this may concern,

**LB Camden: Request for assistance in meeting the accommodation needs of Gypsies and Travellers and identifying a five year housing land supply**

The London Borough of Camden is currently in the process of preparing a new Local Plan. The Plan will set out the Council's vision for future development in Camden from 2026 to 2041 and include the planning policies and site allocations to help achieve this.

The Council has published the [Camden Local Plan Proposed Submission Draft](#) for consultation (Regulation 19), with the aim of submitting it to the Planning Inspectorate for examination in the Autumn.

Alongside the Submission Draft Local Plan, we have also published a [Draft Duty to Co-operate Statement](#), setting out how the Council has co-operated with other bodies as part of the preparation of the Local Plan to-date.

The purpose of this letter is to ask whether your Council would be in a position to:

1. assist Camden in meeting the accommodation needs of Gypsies and Travellers; and
2. assist Camden in identifying a five year housing land supply of deliverable sites at examination (with the first five years of the Plan period being from 2026/27 to 2030/31).

**Meeting the accommodation needs of Gypsies and Travellers**

Camden has an established community of Irish Gypsy and Traveller households, of which a small proportion live on designated sites, while the remainder live in undesignated, conventional housing. There are two authorised, Council-owned, Gypsy and Traveller sites in the borough (accommodating 4 pitches in total) and no transit pitches. The Council owned sites are small and close to existing residential properties. There is no scope to provide additional pitches on or adjacent to the current sites.

The adopted Camden Local Plan (2017) identifies a need for 16 additional traveller pitches to 2031, based on an assessment of need completed in 2014.

The London Plan 2021 indicates that boroughs should update their gypsy and traveller accommodation needs assessments as part of the Local Plan review process. You may be aware that, to inform the review of the London Plan, the GLA have commissioned a London-wide Gypsy and Traveller Accommodation Needs Assessment. The provisional findings of the emerging Assessment identify a need for 11 additional pitches in Camden by 2031/32. The overall need for the period covered by the new Local Plan (to 2041) is estimated to be 19 additional pitches.

To inform the preparation of the new Local Plan, Camden carried out a call for Gypsy and Traveller sites in Winter 2022/23. Previous calls for sites were also undertaken as part of the consultation on the draft Site Allocations Local Plan in 2020 and 2021/22. However, no sites were submitted to the Council for consideration.

In 2023, the Council commissioned Aecom to undertake a [Gypsy and Traveller Site Identification Study](#) to identify Council-owned sites which could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.

The study identified 18 parcels of land that were considered to be potentially suitable, available and achievable, subject to further assessment by the Council. Further assessment work ruled out 16 of these parcels of land as either unsuitable or unavailable. The two remaining parcels of land have been allocated in the Camden Local Plan Proposed Submission Draft. It is anticipated that these sites could deliver a maximum of six pitches. This will go some way to meeting the identified need for Gypsy and Traveller accommodation in Camden, but will not meet the identified need in full.

We are therefore writing under the duty to cooperate to ask whether your Council would be in a position to assist Camden in meeting the accommodation needs of Gypsies and Travellers. For your information, a similar request has also been sent to all other London authorities.

## **Housing Land Supply**

The London Plan sets a housing target for Camden of 10,380 additional homes from 2018/19 to 2028/29 (1,038 homes per year).

The Camden Local Plan Proposed Submission Draft aims to deliver a minimum of 11,550 additional homes over the plan period to 2041. This target has been derived in accordance with the guidance in the London Plan and includes the final three years of Camden's targets for 2019/20 to 2028/29 from the London Plan, and the anticipated backlog against this target at the start of the Local Plan period. It is a capacity-based figure, based on expected delivery over the Plan period (from sites with planning permission and allocated sites), factoring in an allowance for unallocated small sites delivering under 10 additional homes (based on evidence of past delivery).

The target also reflects the delay associated with HS2 and development at Euston, assuming delivery within the Local Plan period of 875 homes from sites encompassed by

the Euston Area Plan<sup>1</sup> (in addition to delivery from existing permissions). This compares with the target of 1,500 to 2,500 additional homes in the draft update of the Euston Area Plan published for consultation in January 2023.

Further information on the housing target set in the Submission Draft Local Plan is set out in the Council's provisional [Housing Trajectory](#).

The review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted will supersede the target in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2028, so this would mean that Camden's new Local Plan housing target is only in place for a short period of time.

The National Planning Policy Framework requires local planning authorities to demonstrate a five year supply of deliverable housing sites plus a twenty percent buffer (where there has been significant under delivery of housing over the previous three years). Camden cannot currently demonstrate a five year housing land supply, but continues to do all it can to achieve it.

Reasons for this include:

- Limited availability of land – we have allocated everything we can (see [Site Selection Topic Paper](#) for further information).
- Uncertainty and delays at Euston and other major sites, often with complex land ownerships.
- High existing use values and build costs, relative to sales values.
- Constraints to housing provision including the Central Activities Zone (CAZ), where the priority in the London Plan is to deliver CAZ uses (over housing), heritage constraints and London's viewing corridors.

Based on current calculations, our estimated housing delivery from 2026/27 to 2030/31 is 4,556 homes. This would deliver a five year housing land supply based on the Local Plan's proposed target of 4,520 over the first five years of the Plan period. However, this does not factor in our backlog against the existing London Plan target, or any buffer arising from our Housing Delivery Test measurement.

Depending on how the backlog arising up to 2026 is calculated, with it incorporated, Camden would have 3.3 to 4.2 years' housing land supply.

If we also add on a 20% buffer in response to the Housing Delivery Test measurement, the housing land supply would be 2.8 to 3.5 years.

This means that after the backlog and buffer are included, we are expecting there to be a shortfall between 2026/27 to 2030/31 of at least 1,980 homes, and potentially up to 3,700 homes.

Given this, we are writing to you under the duty to cooperate to ask whether your Council has sites available that could accommodate all or a proportion of Camden's unmet housing need over the period from 2026/27 to 2030/31 (currently estimated to be between 1,980

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<sup>1</sup> We currently anticipate that 1,750 homes will be delivered within the boundary of the Euston Area Plan in addition to existing permissions, but only half will be delivered within the Local Plan period.

homes and 3,700 homes), to help Camden in identifying a five year housing land supply of deliverable sites at examination. The Council does however recognise that each authority's first responsibility is to meet its own local housing needs and that any contribution to help Camden identify a five year housing land supply at examination is an additional ask on top of this. For your information, a similar request has also been sent to all other London authorities.

### **Next Steps**

We would be grateful if you could respond to this letter by the 27 June 2025. In the meantime if you would like more information, or to discuss this matter further then please contact [Rebecca.Burden@camden.gov.uk](mailto:Rebecca.Burden@camden.gov.uk) (Development Plans Manager) cc'ing [PlanningPolicy@camden.gov.uk](mailto:PlanningPolicy@camden.gov.uk)

Yours sincerely,

Dan Pope  
Chief Planning Officer