

# Statement of Common Ground between the London Borough of Camden and the City of London Corporation

September 2025

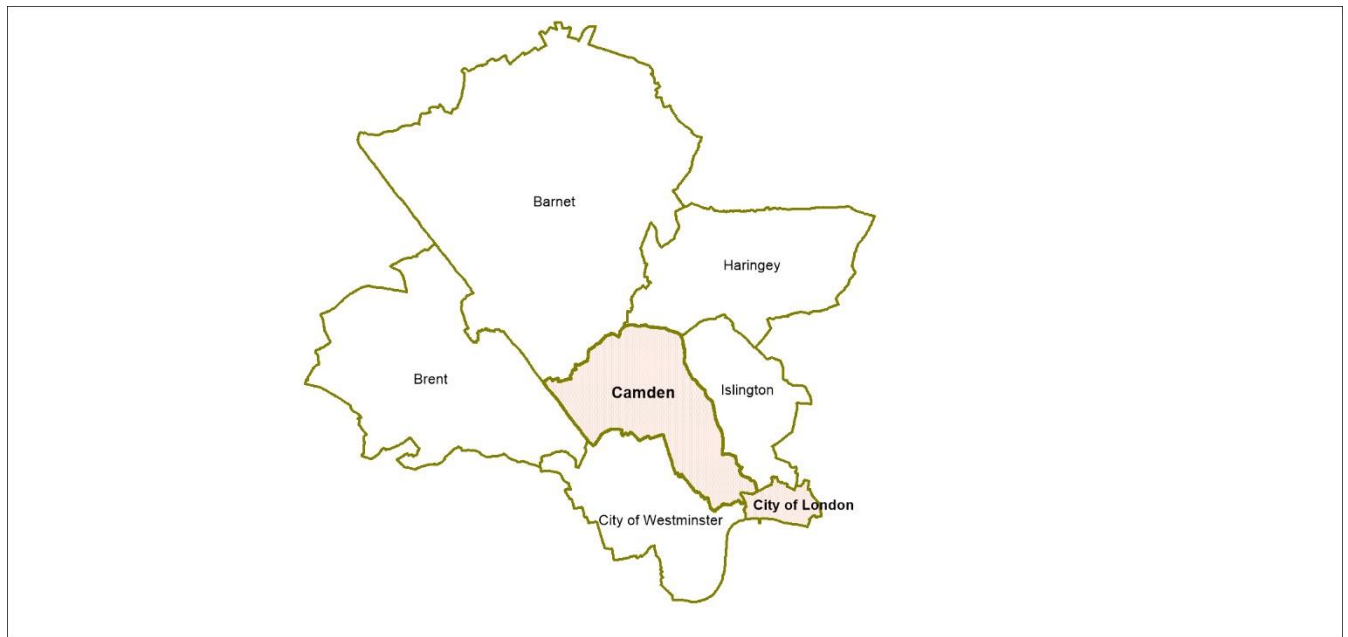


## **Introduction**

1. This document is the Statement of Common Ground (SoCG) between the London Borough of Camden and the City of London Corporation.
2. It has been prepared to demonstrate that Camden's Local Plan Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' in accordance with Paragraph 36 of the National Planning Framework (NPPF) throughout the plan preparation period and will inform further engagement to ensure effective implementation of Local Plan policies.
3. It focuses on areas of agreement, any areas of disagreement and ongoing discussions between London Borough of Camden and the City of London Corporation on strategic cross boundary matters.
4. In the spirit of collaboration, the document has been prepared as a 'live' document, which can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating. This should be read in conjunction with the Statement of Common Ground between Camden and the City of London prepared for the City of London Local Plan, which was signed April 2024.
5. The London Borough of Camden is reviewing its Local Plan 2017 and Site Allocations 2013. Camden published a Draft Site Allocations Local Plan for consultation in February - April 2020, with further consultation on the Plan undertaken in December 2021 - January 2022. It was then decided to incorporate the Site Allocations into the draft Local Plan, rather than take it forward as a separate document. Following a call for views consultation in November 2022 - January 2023, consultation on a draft new Local Plan took place in January - March 2024.
6. The Camden Local Plan Proposed Submission Draft (Regulation 19) was subsequently published for consultation from May to June 2025. LBC Camden are intending to submit the Camden Local Plan Proposed Submission Draft to the Planning Inspectorate for examination in October 2025.
7. The City of London Local Plan was adopted in January 2015. The City Plan 2040 (Regulation 19) has been published and submitted for examination. The examination hearings began in March 2025 and concluded in June 2025. The City Corporation is preparing for the consultation on the main modifications recommended by the Inspectors. It is expected that this consultation will run over the Winter 2025 and the plan will be adopted by Summer 2026.

## **Strategic Geography**

8. The SoCG covers the Local Planning Authority areas of the London Borough of Camden and the City of London Corporation. The boundaries of these areas are shown on Figure 1.



*Figure 1: The London Borough of Camden and the City of London Corporation boundaries*

### **London Borough of Camden**

9. Camden is a diverse inner London Borough with a population of approximately 215,000. Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End and City of London. Further north the character changes with many residential areas and neighbourhoods, including Camden Town, Hampstead, Highgate, Swiss Cottage, West Hampstead and Kentish Town, each with their own distinctive identity and characteristics. The character of the borough is also shaped by its topography and by significant parks and open spaces including Hampstead Heath and Primrose Hill

### **City of London**

10. City of London covers just over one square mile and is located strategically within the central area of London sharing its boundaries with London Boroughs of Islington, Hackney, Tower Hamlets, Southwark, Westminster, Camden, and Lambeth. It is a place with distinct character and a rich and long history, being home to iconic architecture both historic and modern – from medieval architecture and historic churches including Wren's St Paul's Cathedral, magnificent Victorian and post-war buildings to the most striking modern architecture. The City's character is hence layered and reflected in its buildings and spaces and its 800-year role as a major international financial centre. It is home to around 21,000 businesses and its resident population of about 8,600

people is significantly smaller than its working population of approximately 615,000. The City is estimated to have attracted 21.5 million leisure and business visits in 2019 and continues to be a world-leading leisure and cultural destination for workers, visitors and residents.

### **Key strategic matters**

11. Many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan or addressed through the preparation of the London Plan. The London Plan is part of the development plan for all planning authorities in London and Local Plans prepared by London boroughs are required to be in general conformity with it.
12. Officers from both authorities have an ongoing and close relationship with Greater London Authority (GLA) officers, attend regular meetings to discuss strategic matters affecting our areas and London as a whole, and have participated in the development and review of the London Plan.
13. Camden and the City of London Corporation have had ongoing dialogue on cross-boundary planning issues for many years, discussing a broad range of planning issues including strategic matters. Meetings were held on 30 June 2017, 15 November 2018, 23 June 2020, 21 June 2021, 21 October 2022, 24 November 2023, 23 May 2024 and 31 July 2025. These discussions have informed development of adopted plans and other related documents (see Appendix 1).
14. The issues set out below are considered to be the key strategic matters with regard to ongoing plan-making relevant to the London Borough of Camden and the City of London Corporation, although it is noted that there are other issues that may have cross-boundary impacts. Camden and the City of London Corporation are committed to further dialogue, not just limited to periods of plan preparation.

### **Housing**

15. The London Plan sets a housing target for Camden of 10,380 additional homes from 2018/19 to 2028/29, which equates to a need to deliver a minimum of 1,038 homes per year. This includes 3,280 homes from small sites. The City of London Corporation's London Plan housing target is 1,460 additional homes over the period 2018/19 to 2028/29. This includes the 740 units from small sites.
16. The Camden Local Plan Proposed Submission Draft aims to deliver a minimum of 11,550 additional homes (770 homes per year) 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 target's 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). It also reflects the uncertainty and delay in development at Euston. In calculating the housing requirement for the Plan period, Camden has taken into account the housing capacity figures for large sites as set out in the Greater London Authority's Strategic Housing Land Availability Assessment (SHLAA) 2017, together with the small sites target set by the London Plan.

17. It should however be noted that the review of the London Plan will result in a new capacity-based housing target for Camden, which once adopted, will supersede the target that is in the new Local Plan. The GLA are aiming to adopt the new London Plan in 2027, so this would mean that Camden's new Local Plan housing target is only in place for a short period of time.
18. The City Plan 2040 aims to deliver 1,706 homes over the plan period. This is based on the annual average London Plan requirement of 146 per annum for the first four years of the City Plan (2025/26 to 2028/29, inclusive) and then reverts to a figure derived from the national standard method of 102 dwellings per year for the remaining 11 years of the Plan period. While the CoLC have not allocated sites in the City Plan for housing, due to the dynamic nature of the land market in the Square Mile, they have evidenced that through the pipeline under construction and approved, together with windfall sites over the later years of the Plan, there is likely to be sufficient capacity to meet the housing requirement. This includes an allowance in later years for sites considered through the London Plan SHLAA. The CoLC have demonstrated that they will likely exceed the full ten year requirement in the London Plan target before 2028/29.
19. Both authorities recognise that the London Plan (2021) is due to be replaced shortly after the anticipated adoption of their Local Plans, and that this will set a new overall housing target for London and provide updated housing targets for individual London boroughs. The Greater London Authority have launched the LAND4LDN programme to provide real time data for London boroughs to use in the updated SHLAA process going forward. Both boroughs will continue to work collaboratively with the GLA on this project.
20. The National Planning Policy Framework requires local planning authorities to demonstrate a five year supply of deliverable housing sites plus a five percent buffer. Camden cannot currently demonstrate a five year housing land supply, but continue to work on meeting this target. Camden have therefore written to the City of London and all other London boroughs under the Duty to cooperate in relation to this matter. City of London have confirmed that they are unable to assist Camden in demonstrating a five year housing land supply due to the spatial constraints of the City and the prioritisation of the CAZ's strategic office function.

## **Gypsy and Traveller accommodation**

21. The City Plan 2040 indicates no specific need for gypsy and traveller accommodation in the City of London, based on the GLA's assessment of gypsy and traveller need.
22. Camden's adopted Local Plan 2017 identifies a need for 16 additional traveller pitches to 2031, based on a 2014 assessment of need.
23. To inform the review of the London Plan, the GLA are carrying out a London-wide Gypsy and Traveller Accommodation Needs Assessment. The provisional findings of the emerging Gypsy and Traveller Accommodation Needs 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) will however be higher and is estimated to be 19 pitches (including the four existing pitches in Camden).
24. As part of the preparation for the new Camden Local Plan, calls for sites suitable for Gypsy and Traveller accommodation were undertaken in 2020, 2021/22 and winter 2022/23.
25. In 2023 the London Borough Camden commissioned consultants to undertake a Gypsy and Traveller Site Identification Study to identify council-owned sites that could potentially be allocated in the new Local Plan to meet the accommodation needs of Gypsies and Travellers.
26. 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 undertaken by officers ruled out 16 of these parcels of land on the basis that they are either unsuitable or unavailable. The two remaining parcels of land have been allocated in the Camden Local Plan Proposed Submission Draft to help meet the accommodation needs of Gypsies and Travellers in Camden. 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, however it will not meet the identified need in full.
27. Camden have therefore written to the City of London Corporation and all other boroughs under the Duty to Co-operate in relation to this matter. City of London have confirmed that they are unable to assist Camden in meeting the need for Gypsy and Traveller accommodation.

### **Central Activities Zone and economic development**

28. The continued success of the Central Activities Zone (CAZ) is vital to London's world city status. The London Plan and local plans prepared by the City of London and Camden seek an increase in office floorspace across the CAZ to sustain London's economic competitiveness. Both authorities have introduced Article 4 Directions to protect central London's strategically important office supply against conversion to residential use under permitted development rights. These Article 4 Directions apply to the whole of the City of London and to relevant parts of the area of Camden that lies within the CAZ.

29. The Camden Local Plan Proposed Submission Draft also supports the Knowledge Quarter District, and the provision of new employment floorspace (including laboratory or lab enabled floorspace) in the area The Knowledge Quarter, centred around King's Cross and Euston, is an internationally significant innovation district, harnessing collaboration between private sector companies, universities, hospitals and research establishments. The Camden Local Plan Submission Draft also includes site allocations to help deliver new employment floorspace in the area to meet the needs of the knowledge economy and CAZ functions in the south of the borough.
30. The London Plan identifies a specialist legal cluster within the CAZ, which includes the Royal Courts of Justice in Westminster and the Inns of Court, two of which are in the City of London (Inner Temple and Middle Temple) and two in Camden (Gray's Inn and Lincoln's Inn). Together this cluster of uses positively contribute to the strategic functions of the CAZ and hold significant heritage and townscape value.
31. Camden and the City of London have compatible policies to protect legal offices, which in the emerging City Plan will fall under the general protection for all types of offices. The existing and emerging City Plans each contain a policy that protects the unique functions of the Temples as places of education, training, collegiate facilities and professional accommodation for barristers and students. The City Corporation is progressing plans for a new court and police complex on Fleet Street to help maintain London's position as a world leading centre for legal services.

### **Tall buildings/protected views**

32. Camden and the City of London Corporation will continue to work together to ensure that new tall buildings are located in suitable areas where adverse impacts on local townscape character and the wider skyline can be prevented. Both authorities' Plans include a Tall Building policy.
33. Protected views are an important strategic planning matter. Three of the London Panoramas identified in the Mayor's London View Management Framework (LVMF) are located in Camden (Parliament Hill, Kenwood and Primrose Hill) and each of these include St Paul's Cathedral as a key landmark. Consequently, linear views of St Paul's cross parts of the London Borough of Camden and the City of London. These views are shown on the Policies Maps produced by each authority. The protection of views of St Paul's Cathedral affects the control of building heights in certain parts of Camden and the City, and the two authorities will continue to cooperate to ensure these strategic views are protected and enhanced.
34. The Camden Local Plan Proposed Submission Draft identifies one site potentially suitable for a tall building close to the boundary with the City of London Corporation - Selkirk House, Museum Street. This is Site Allocation S24 and has been granted planning permission. (There is an existing tall building on site.) The City Plan 2040 includes a Tall Building Cluster – The Fleet Valley

Area, which, whilst not immediately adjacent to the boundary with Camden, it is in the vicinity of Camden and the wider strategic views. No comments were raised by Camden in relation to this proposed cluster during consultation on the City Plan 2040 and City raised no objections to the Selkirk House Planning application.

### **Open Spaces**

35. Hampstead Heath is the largest open space in the London Borough of Camden and is managed and owned by the City of London Corporation. It includes important outdoor sporting facilities and Camden and the City of London will continue to ensure this large open space, which is designated as Metropolitan Open Land, is properly safeguarded.

### **Culture and visitors**

36. The Camden Local Plan Proposed Submission Draft recognises the continued importance of Holborn as a focus for future development in the south of the area. The area is predominantly commercial and High Holborn / Kingsway is designated as a Central London Frontage, recognising its role as a shopping and service area and its identification as a CAZ retail cluster in the London Plan. This area partially adjoins the City of London. Camden has adopted a Supplementary Planning Document – Holborn Vision. This aims to enhance the varied and distinctive character of its thriving commerce, diverse and flourishing neighbourhoods and unique culture. Transform the public realm and create a better connected, safer, greener and climate resilient environment.
37. The City Plan 2040 identifies the south side of Holborn as a retail cluster, which will play an important role in revitalising and bringing vibrancy to this area. There may be potential for partnership working and the City Plan recognises opportunities to work with the Fleet Street Quarter Business Improvement District (BID) to help deliver improved links including the area up to High Holborn.
38. The area within Camden to the north of Holborn Circus includes Hatton Garden, which is famous nationally for the jewellery businesses that give the area its special character. Camden has a policy focussed on protecting and securing jewellery workshop creative space and related uses in Hatton Garden. The Hatton Garden area is located adjacent to the cultural focal area (Fleet Street) that has been identified in the City Corporation's Culture Planning Framework as having potential to flourish. Camden's Holborn Vision SPD seeks to ensure the Hatton Garden specialist shopping area benefits from the opening of the new Museum of London in the Smithfield area in the City by improved wayfinding and working with the City of London, together with Islington, TfL and landowners to improve the public realm.
39. The Councils agree to continue to work cooperatively on these matters.

### **Euston**

40. The Camden Local Plan Proposed Draft contains a Euston Area policy, setting the overall objectives for the area. An update to the Euston Area Plan (2013) is being prepared. Consultation on a Regulation 18 version of the Plan took place in December 2023 and September 2024 and the Regulation 19 version of the Plan is currently being prepared. Consultation on the Proposed Submission Draft EAP is expected to be undertaken in winter 2025. A separate Statement of Common Ground relating to the Euston Area Plan will be prepared at the relevant time.

## **Infrastructure**

41. Camden published a draft Infrastructure Delivery Plan (IDP) alongside the Submission Draft Local Plan (Reg 19 stage) to identify the infrastructure needed to support the future growth anticipated in the Plan. This is being updated and finalised for Submission.

## **Governance arrangements**

42. This Statement has been informed by ongoing engagement between Camden and the City of London Corporation (as set out in Appendix 1). It has been prepared as a 'living' document, which will be reviewed and updated at key stages in the plan-making processes of either authority, and will form part of the implementation of Local Plan policies and any future Local Plan reviews (for both authorities).
43. Specific officer-level meetings to discuss cross-boundary issues will continue to be held, together with attendance at sub-regional or London wide group and partnership meetings where cross boundary issues are discussed.

## **Timetable for review and ongoing cooperation**

44. The following table details the proposed timetable for key stages in Local Plan reviews, which will inform timings of future discussions. At these key stages, this Statement will be considered and updated, if necessary.

*Table 1 – Local Plan timescales*

| <b>Borough</b>                  | <b>Current Local Plan adoption</b> | <b>Local Plan Review – Reg 18</b>                                                    | <b>Local Plan Review – Reg 19</b> | <b>Local Plan Review – Anticipated submission</b> |
|---------------------------------|------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------|---------------------------------------------------|
| <b>London Borough of Camden</b> | Local Plan - July 2017             | Draft Site Allocations Plan – Feb 2020<br><br>Draft Site Allocations Plan - Dec 2021 | May - June 2025                   | October 2025                                      |

|                                   |                           |                                                                                                                      |                                   |             |
|-----------------------------------|---------------------------|----------------------------------------------------------------------------------------------------------------------|-----------------------------------|-------------|
|                                   |                           | Local Plan review calls for views - Nov 2022<br><br>Draft Local Plan (incorporating site allocations) - January 2024 |                                   |             |
| <b>City of London Corporation</b> | Local Plan - January 2015 | Issues and Options – Sept 2016<br><br>Draft Plan - Nov 2018                                                          | March 2021<br><br>April/June 2024 | August 2024 |

## Signatures

45. Both parties agree that this Statement is an accurate representation of matters discussed and issues agreed upon. We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between the London Borough of Camden and the City of London Corporation. The authorities will continue to work collaboratively to address cross-boundary issues and to meet the duty to cooperate.

### **LONDON BOROUGH OF CAMDEN**

**Name:** Rebecca Burden

**Position:** Development Plans Manager

**Signature:** R.Burden

**Date:** 11/09/2025

### **CITY OF LONDON CORPORATION**

**Name:** Rob McNicol

**Position:** Assistant Director – planning policy and strategy

**Signature:**



**Date:** 11/09/25

## Appendix 1 – Liaison meetings between the Camden and City of London (CoL) Corporation

| Date             | Title/Purpose                                                     | Key topics of discussion                                                                                                |
|------------------|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| 30 June 2017     | London Borough of Camden and CoL Duty to Co-operate (DtC) meeting | Discussed progress of Local Plans.                                                                                      |
| 15 November 2018 | London Borough of Camden and CoL DtC meeting                      | Discussed issues relevant to both boroughs.                                                                             |
| 23 June 2020     | London Borough of Camden and CoL DtC                              | Discussed issues relevant to all boroughs.                                                                              |
| 21 June 2021     | London Borough of Camden and CoL DtC                              | Discussed issues relevant to all boroughs.                                                                              |
| 21 October 2022  | London Borough of Camden and CoL DtC meeting                      | Discussed issues relevant to all boroughs.                                                                              |
| 24 November 2023 | London Borough of Camden and CoL DtC meeting                      | Discussed progress of Local Plans and SoCG                                                                              |
| 23 May 2024      | London Borough of Camden and CoL DtC meeting                      | Discussed progress of local Plan, housing matters, tall buildings, approach to retrofitting, and engagement strategies. |
| 31 July 2025     | London Borough of Camden and CoL DtC meeting                      | Discussed progress of Local Plans and SoCG                                                                              |