

London Borough of Camden

**Camden Local Plan Proposed Submission Draft
2025**

DUTY TO CO-OPERATE STATEMENT

April 2025

Contents

1. Introduction and legal context
2. Camden context
3. Co-operation activities with relevant bodies
4. Consideration of strategic and co-operation matters
5. Conclusion

Appendix 1 - Duty to co-operate meetings

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 will be updated prior to submission of the Draft Local Plan as necessary 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">City of London Local Plan - adopted January 2015Draft City Plan 2040 - submitted for examination August 2024
London Borough of Barnet	<ul style="list-style-type: none">Barnet Local Plan - adopted March 2025
London Borough of Brent	<ul style="list-style-type: none">Brent Local Plan - adopted February 2022
London Borough of Haringey	<ul style="list-style-type: none">Strategic Policies - adopted 2013 - alterations adopted July 2017Development Management and Site Allocations Development Plan Documents - adopted July 2017

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

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.
 - Consultation on a Draft New Local Plan ran from January to 13 March 2024. The comments made were considered in the preparation of the Regulation 19 Draft version of the new Local Plan.
 - Publication of the Submission Draft Camden Local Plan for public comment May 2025.
- 2.7 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 have informed the allocations contained in the draft Local Plan.
- 2.8 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.
- 2.9 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 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 review 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 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. Strategic matters discussed included the overall approach to housing, affordable homes, student housing, and provision for Gypsy and Travellers 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 ongoing Strategic Housing Land Availability Assessment (or SHLAA, also known as LAND4LDN) 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 are set out in Appendix 1. Further detail on the GLA's responses to consultation on the Local Plan is set out in Section 4 below. GLA and Camden officers both also attend Londonwide ALBPO meetings which discuss matter of strategic importance for London (see paragraph 3.9).

Transport for London

- 3.7 Transport for London (TfL) is the integrated transport authority for London. It responsible for implementing the Mayor's Transport Strategy, the capital's public transport network and its strategic road network. The City Corporation 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

- 3.8 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.
- 3.9 Camden officers also attend meetings of the Association of London Borough Planning Officers (ALBPO) Development Plans Committee, of which all London boroughs are members. These are London-wide forums for the discussion of strategic issues and include updates from authorities on policy work and issues. ALBPO meetings attended by Camden officers are set out in Appendix 1.
- 3.10 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 coordinated manner. The Council also is working with London Councils and other interested boroughs on the development of a London Surface Water Strategy.
- 3.11 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 Summer 2022 – Spring 2023 to produce

evidence that could be utilised 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.

- 3.12 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

- 3.13 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. Further detail of the Environment Agency's comments on the Draft Plan and how they have been considered is set out in Section 4.

Historic England

- 3.14 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. Further detail on their comments on the Draft Plan and how they have been considered is set out in Section 4.

Natural England

- 3.15 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 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

- 3.16 Officers from the Council's Planning, Property and Social Care services attend the regular Camden Local Estate Forum meetings. 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.

- 3.17 HUDU have provided responses to consultation on the Local Plan, prepared in consultation with the ICB and NHS providers. Further detail on how these comments have been considered is set out in Section 4.

Other bodies

- 3.18 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

- 3.19 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.
- 3.20 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.
- 3.20 The Council has produced Statements of Common Ground with its neighbouring boroughs (City of London, Barnet, Brent, Haringey, Islington, and Westminster City Council). At the time of publication the Council has Statements of Common Ground signed with Barnet, Brent, City of London, Haringey and Islington, with the Statement of Common Ground with Westminster, due to be finalised shortly. The Statements of Common Ground will be published on the Council's website and kept up-to-date as required.

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 Submission Draft Camden Local Plan.

Strategic issue	Consideration of issue and outcomes
Meeting housing needs	<p>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.</p> <p>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 / 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 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 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.</p> <p>Housing is a standing item on the agenda for duty-to-co-operate meetings with neighbourhood boroughs, and the matter has therefore been discussed at the meetings set out in Appendix 1.</p>
Affordable Housing	<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</p>

	<p>Plan could itself change through the review process. Amendments, agreed with the GLA, have been made to the wording in the Proposed Submission Draft Plan to reflect these discussions.</p>
Euston Opportunity Area	<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. In response the Council have included a specific policy on the Euston Area in the Submission Draft Local Plan (Policy S2). The policy 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. 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, 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.</p>
Accommodation for Gypsies and Travellers	<p>The GLA's response to the Draft Local Plan stated that draft Plan should use site allocations to explore opportunities to meet the need for pitches for the Gypsies and Travellers community. The Submission Draft Local Plan allocates two sites for provision of accommodation for gypsies and travellers.</p> <p>Camden has engaged with the GLA in the production of a London-wide Gypsy and Traveller Accommodation Needs Assessment, which expected to be published in Spring 2025.</p> <p>Accommodation for Gypsies and Travellers is a standard agenda item at co-operation meetings held with neighbouring boroughs. Although the Submission Draft Local Plan allocates sites for the provision of Gypsies and</p>

	<p>Travellers accommodation it does not fully meet identified. Therefore, the Council is writing to all other London boroughs asking whether they were able to assist in meeting these needs.</p>
Transport	<p>Transport for London welcomed that the draft Local 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.</p> <p>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>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>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>
Water and flood risk	<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 SuDS, and Policy CC9 Water efficiency requiring residential developments to achieve a water efficiency of 110 litres of water per head per</p>

	<p>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>They also welcomed:</p> <ul style="list-style-type: none"> • recognition of the issue of flooding through the Local Flood Risk Zone • 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 • 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. <p>The Environment Agency considered that the draft Local Plan is a “strong plan” with respect to groundwater and land quality issues, and noted that their previous comments have been incorporated well into the proposed policies.</p>
Tall buildings / strategic views	<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>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</p>

	<p>assessed against D2, London Plan policy D9 and other relevant policies and no change was considered necessary.</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 further 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 this matter in September 2024. Subsequently Historic England provided further comments on some site allocations. These were considered by the Council and relevant amendments made.</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 consider 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 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>
Waste	<p>As noted in paragraph 3.4 above, Camden worked jointly with the London Boroughs of Barnet, Enfield, Hackney,</p>

	<p>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.</p>
Climate Change	<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>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 have been 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>
Site allocations	<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 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, National Grid, Natural England, Transport for London.</p> <p>The Environment Agency, Historic England, National Grid, and Transport for London responded during the second</p>

	<p>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. The allocation for this site in the Submission Draft Plan requires development to intensify industrial provision to increase, or at least maintain, capacity.</p> <p>It was not considered appropriate to set out a detailed floorspace figures.</p> <p>The GLA also requested that industrial floorspace, including uses B8, which 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 the future planning of these areas / sites to consider cross-boundary impacts.</p> <p>The Environment Agency provided detailed comments on environmental constraints on individual sites. Amendments to the Plan were made as appropriate.</p> <p>Historic England broadly welcomed the inclusion of detail within site allocations relating to heritage assets that may be</p>
--	---

	<p>affected by development proposed. They provided specific comments relating to a number of the site allocations in the Draft Local Plan, in particular regarding clarification of how building heights have been determined, particularly in relation to those with potential effects on heritage assets. Amendments to the Plan in response to Historic England's comments were made as appropriate.</p>
Natural environment	<p>The Environment Agency's response 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.</p> <p>LB Islington's response to the Draft Local Plan was supportive of policies which 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>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>
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 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</p>

	<p>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).</p> <p>LB Islington's response to the Draft Local Plan supported the Plan's approach to directing retail and leisure development to designated centres.</p>
--	---

5. Conclusion

- 5.1 Camden Council considers that this Duty to Co-operate Statement demonstrates how it has fulfilled its 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 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 Draft Local 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.
- 5.4 This Statement will be updated, as necessary, prior to the submission of the Camden Local Plan for examination to reflect ongoing engagement and co-operation.

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

City of London	15 November 2018 23 June 2020 21 June 2021	21 October 2022 24 November 2023 23 May 2024
London Borough of Barnet	31 January 2019 28 April 2021	20 September 2023 4 July 2024
London Borough of Brent	16 May 2018 7 July 2021	19 April 2023 16 May 2024
London Borough of Haringey	2 August 2018 20 September 2019 14 April 2021	14 February 2023 20 June 2024
London Borough of Islington	26 April 2018 13 March 2019	3 March 2021 9 June 2023 11 July 2024
Westminster City Council	16 May 2018 13 December 2018	17 March 2021 11 September 2023 20 June 2024
Greater London Authority	12 May 2021 24 November 2022 25 January 2023 18 May 2023 15 June 2023	23 February 2024 19 December 2024 28 January 2025 10 February 2025
Association of London Borough Planning Officers (ALBPO)	26 September 2017 26 January 2018 6 March 2018 1 May 2018 3 July 2018 18 September 2018 13 November 2018 25 January 2019 4 April 2019 16 July 2019 17 September 2019 12 November 2019	31 March 2020 9 March 2021 4 May 2021 12 October 2021 8 November 2022 14 March 2023 9 May 2023 7 November 2023 16 January 2024 7 May 2024 24 September 2024
Central London Forward Planning Officer Group	18 March 2021 21 April 2021 17 June 2021 14 October 2021	4 May 2023 6 July 2023 21 February 2024 12 September 2024

3 November 2022	7 November 2024
12 January 2023	6 January 2025
9 March 2023	17 February 2025