# Statement of Common Ground between the London Borough of Camden and Brent

April 2025





#### Introduction

- 1. This document is the Statement of Common Ground (SoCG) between the London Boroughs of Camden and Brent.
- 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 Boroughs of Camden and Brent on strategic cross boundary matters.
- 4. In the spirit of collaboration, the document has been prepared as a 'live' document, that 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 Brent prepared for the Brent Local Plan, which was signed March 2020.
- 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.
  - In response to the previous engagement rounds and updated evidence, revisions have been made to the Local Plan. Camden is undertaking consultation on the Camden Local Plan Proposed Submission Draft (Regulation 19) from Apil to June 2025, with submission to the Planning Inspectorate expected in the Autumn 2025.
  - 7. The Brent Local Plan 2019 2041 was adopted in February 2022.

#### **Strategic Geography**

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

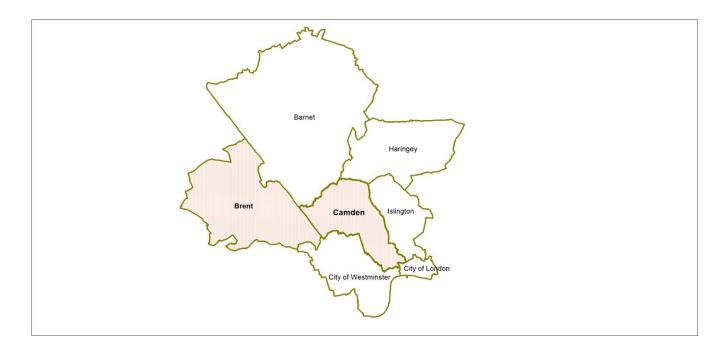


Figure 1: Boundaries of the London Boroughs of Camden and Brent.

## **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

# **London Borough of Brent**

10. Brent covers an area of almost seventeen square miles between inner and outer north west London. It shares a small boundary in the south with Camden, Westminster, Hammersmith and Fulham and Kensington and Chelsea, Barnet to the east, Harrow to the north and Ealing to the west. It also has a boundary with the Old Oak Park Royal Development Corporation. Brent is home to around 344,500 people (mid-year 2024) which is predicted to grow by 24% by 2041.

#### **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 Brent 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 16 May 2018, 7 July 2021, 19 April 2023 and 16 May 2024. These discussions have informed development of emerging and 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 Boroughs of Camden and Brent although it is noted that there are other issues that may have cross-boundary impacts. Camden and Brent 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.
- 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 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). 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 adopted Brent Local Plan aims to deliver over 46,016 homes in the plan period of 2019-2041
- 19. Both authorities recognise that the London Plan (2021) is due to be replaced shortly 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 will therefore be writing to Brent and other boroughs under the Duty to cooperate in relation to this matter.

# Gypsy and traveller accommodation

- 21. The Brent Local Plan recognises that there is one existing dedicated Gypsy and Traveller site in the borough. Brent undertook work with other West London Boroughs in 2018 to assess Gypsy and Travelling Showpeople Accommodation Assessment. This showed a requirement for Brent of zero pitches using the national definition and 90 pitches using the London Plan definition.
- 22. Camden's adopted Local Plan identifies a need for 16 additional traveller pitches to 2031, based on a 2014 assessment of need.
- 23. The London Plan 2021 indicates that boroughs should update their gypsy and traveller accommodation needs assessments as part of the Local Plan review process. 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 additional pitches. This review has identified a need in Brent for 51 pitches to 2031/32. The Council is likely to jointly, or on its own, conduct a further assessment addressing beyond this period to support its local plan review.
- 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 will therefore be writing to Brent and other boroughs under the Duty to Co-operate in relation to this matter.

#### **Town Centres**

28. Kilburn High Road town centre extends across the border between Camden and Brent and is identified in both borough's Local Plans as a major centre. Both boroughs have policies to support the town centre and will continue to work collaboratively to support it.

## Tall buildings

29. The Brent Local Plan and the Camden Submission Draft Plan both have a policy on Tall Buildings. There are no sites identified in the Camden Submission Draft Plan close to the border with Brent.

#### **Euston Area**

30. The Camden Local Plan Proposed Submission Draft contains a policy on the Euston Area, setting the overall objectives for the area. The Council is also preparing an update to the Euston Area Plan (2013). 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. A separate Statement of Common Ground relating to the Euston Area Plan will be prepared at the relevant time.

#### Infrastructure

- 31. Camden intend to publish an 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.
- 32. Brent published an Infrastructure Delivery Plan in October 2019 to support their future growth in the Local Plan.

#### **Governance arrangements**

33. This Statement has been informed by ongoing engagement between Camden and Brent (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 a key part of implementation of Local Plan policies and any future Local Plan reviews (for both authorities).
- 34. Specific officer-level meetings to discuss cross-boundary issues will continue to be held on a regular basis, together with attendance at sub-regional or London wide group and partnership meetings where cross boundary issues are discussed.
- 35. Officers in each local authority will feed back to senior officers any relevant issues raised in discussions. Likewise, any senior level discussions on relevant cross-boundary issues will inform discussions on strategic planning matters.

#### Timetable for review and ongoing cooperation

36. 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 proposed timescales

Borough	Current Local Plan adoption date	Local Plan Review – Reg 18 date	Local Plan Review – Reg 19 date	Local Plan Review – Anticipated submission date
London Borough of Camden	Local Plan - July 2017	Draft Site Allocations Plan – Feb 2020  Draft Site Allocations Plan - Dec 2021  Local Plan review calls for views - Nov 2022  Draft Local Plan (incorporating site allocations - January 2024	April 2025	September 2025
Brent	Brent Local Plan 2019 - 2041	NA – to use the proposed new Local Plan adoption process, with preparation starting in 2026.		

# **Signatures**

37. 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 Islington. 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: 14 April 2025

# **LONDON BOROUGH OF BRENT**

P. Lewin

Name: Paul Lewin

**Position: Spatial Planning and Transportation Manager** 

Signature:

Date: 14th April 2025

# Appendix 1 – Liaison meetings between the Camden and Brent

Date	Title/Purpose	Key actions
16 May	London Borough	Discussed issues relevant to all
2018	of Camden, Brent and Westminster	boroughs.
	DtC meeting	
7 July 2021	London Borough	Discussed issues relevant to both
	of Camden and	boroughs.
	Brent DtC meeting	
19 April	London Borough	Discussed issues relevant to both
2023	of Camden and	boroughs.
	Brent DtC meeting	
16 May	London Borough	Discussed issues relevant to both
2024	of Camden and	boroughs.
	Brent DtC meeting	_