

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

April 2024



Introduction

1. This document is the Statement of Common Ground (SoCG) between the London Borough of Camden and the City of London Corporation.
2. The SoCG applies to the review of the City of London Local Plan (known as City Plan 2040). It sets out details of the cooperation between Camden and the City of London throughout the plan preparation period and will inform further engagement to ensure effective implementation of Local Plan policies.
3. Camden's current Local Plan was adopted in July 2017. It replaced the previous Core Strategy and Development Policies documents and is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the London Borough and contains policies for guiding planning decisions up until 2031. Camden are currently carrying out a review of their Local Plan. Following a call for views consultation in November 2022 - January 2023, consultation on a draft new Local Plan took place in January - March 2024. Camden also 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. Site allocations are now being taken forward as part of the Local Plan, rather than in a separate document.
4. The City of London Local Plan was adopted in January 2015. The City Plan 2040 has been in development for a number of years and has undergone extensive public engagement over this time:
 - 2016 – an issues and options consultation took place (the 'regulation 18' consultation)
 - 2018 – consultation on a draft local plan
 - 2021 – the first proposed submission version of the City Plan 2036 was published and consulted on (regulation 19 stage)
5. The City Corporation has produced further evidence work and revised the City Plan in light of the issues raised during the pre-submission consultation. These issues were primarily related to:
 - Tall buildings and their impacts on heritage, including an issue of 'non-conformity' with the London Plan
 - Sustainability, in particular the approaches to embodied carbon and demolition
 - The need for more recent evidence on office and retail demand, given shifting working patterns and changes to shopping behaviours following covid-19
 - How inclusive approaches can be woven into more aspects of the City Plan, especially as the City aims to widen its appeal to visitors
6. During the summer of 2023, further informal public engagement was undertaken, providing everyone with an opportunity to shape future development in the Square Mile and to inform the City Plan.
7. In response to the previous engagement rounds and updated evidence, substantial revisions have been made to the City Plan. The City Corporation will publish the Revised Proposed Submission draft City Plan 2040 for the Regulation 19 consultation in April 2024.

Geography covered by Statement of Common Ground

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



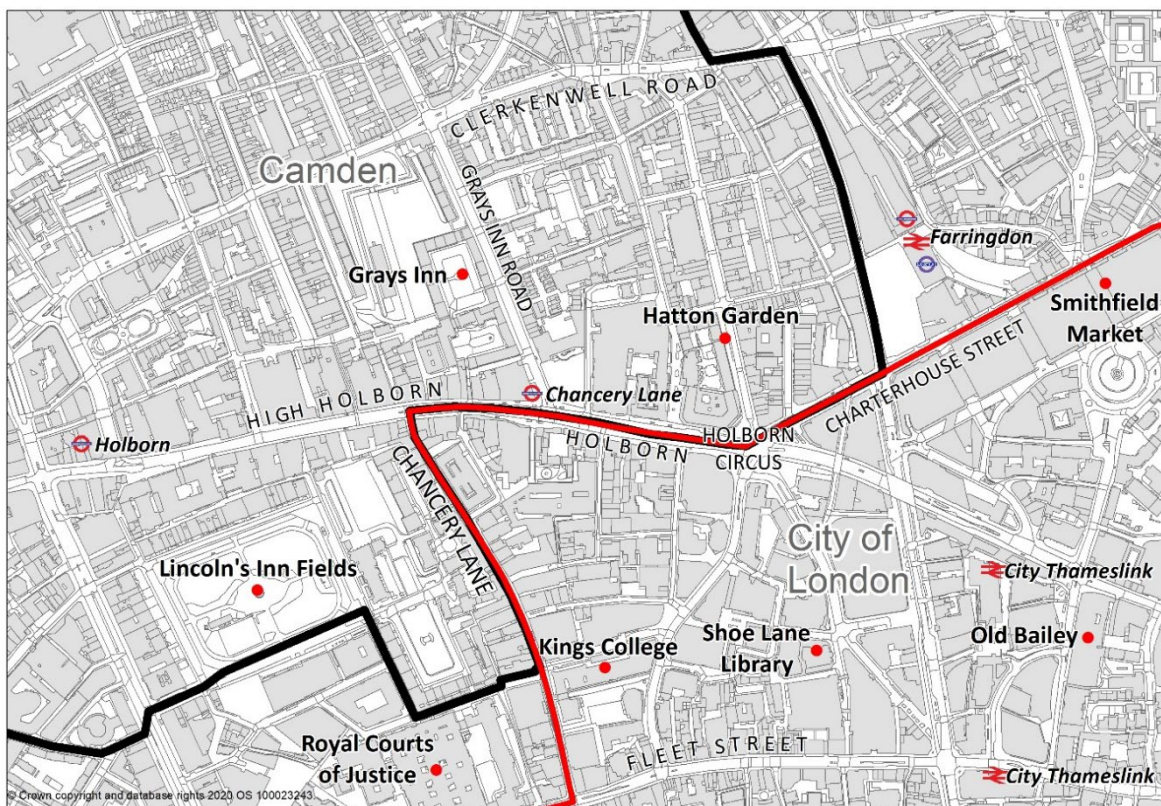
Figure 1: The City of London and London Borough of Camden boundaries

London Borough of Camden

9. Camden is a diverse inner London Borough with a population of approximately 215,000. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End, as well as London Plan Opportunity Areas based around the major rail terminals at Euston and King's Cross. Further north the character changes with many residential areas and neighbourhoods, including Camden Town, Hampstead and 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 the adjoining 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 some of the most iconic architecture both historic and modern – from medieval architecture and churches including Wren's iconic 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 located at the heart of CAZ. 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 the world-leading leisure and cultural destination for workers, visitors and residents.



Map 2: Boundary between the London Borough of Camden and the City of London

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 are otherwise addressed through the preparation of the London Plan. The London Plan is part of the development plan for planning authorities in London and Local Plans prepared by the City of London and the 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 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. Specific meetings have been held on 29 April 2015, 15 March 2016, 30 June 2017, 15 November 2018, 23 June 2020, 21 October 2023 and 24 November 2024. These discussions have informed development of adopted plans and other related documents (Refer Appendix 1).
14. The following issues are the key strategic matters about ongoing plan-making, 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 moving forward, and not just limited to periods of plan preparation.

Housing

15. London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The Mayor of London has carried out a London-wide Strategic Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The Local Plans are required to be in general conformity with the London Plan, which sets a housing target for all the London Boroughs.
16. The City Corporation's aims to deliver 146 additional residential units per annum up to 2028/29. The target for the plan period to 2040 is 1,706 units.
17. The draft Camden Local Plan aims to deliver 11,550 additional homes (770 homes per year) over the period to 2041.

Gypsy and traveller accommodation

18. The GLA is an integral stakeholder in terms of meeting need for Gypsy and Traveller Accommodation. Camden and the City of London will work with the GLA to explore ways to meet any identified needs of gypsy and travellers on a regional/sub-regional basis. The GLA's Gypsy and Traveller Housing Needs Assessment (2023/24) states that the City of London has no assessed need for Gypsy and Traveller Accommodation.

Central Activities Zone and economic development

19. 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 that 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 the vast majority of office premises in Camden's part of the CAZ.
20. The City Plan 2040 seeks to provide a minimum of 1.2 million sqm additional office floorspace in the City of London, in line with the City's identification as a nationally important location for globally oriented financial and professional services in the London Plan.

21. 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 contributes to the strategic functions of the CAZ and holds significant heritage and townscape value. Camden and the City of London have policies to protect legal offices and accommodation and the City Corporation is delivering new court and police facilities at Salisbury Square, in partnership with the Ministry of Justice, to help maintain London's position as a world leading centre for legal services. The City Corporation's draft City Plan 2040 has introduced greater flexibility into its policy on the Temples area, to recognise that the legal profession requires the scope to be able to change use between existing residential and office buildings to meet the needs of new working practices. The Plan no longer requires a balance of residential and office uses to be maintained in the Temples.

Culture and visitors

22. The draft City Plan 2040 seeks the development of a wide range of cultural and leisure facilities across the City, in line with 'Destination City', the City Corporation's flagship strategy, which recognises the crucial role culture and visitors will play in creating a more vibrant Square Mile. The City Plan is underpinned by the Culture Planning Framework, which provides a broad framework for what culture infrastructure should be provided in the City, and where.
23. The 'Fleet Street' and 'Smithfield and Barbican' have been identified in the City Plan as areas, which are likely to experience significant transformation over the plan period. These 'Key Areas of Change' partially adjoin the London Borough of Camden; therefore it is envisaged close cooperation is required for these areas.
24. The area within Camden to the north of Holborn Circus includes Hatton Garden, which is famous nationally for its jewellery sector that gives 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.
25. The City Plan 2040 encourages culture-led mixed-use development on major sites in the Smithfield and Barbican area, along with the promotion of new cultural activity and attractions including proposals for relocation and reopening of the London Museum from London Wall to Smithfield, and in the longer term, the relocation of Smithfield Market and re-use of the existing market buildings for other uses.
26. The Elizabeth Line has improved public transport accessibility in and around Farringdon Station and potentially increased tourist and visitor footfall. The emerging City Plan 2040 provides a supportive policy framework for the development of additional hotel capacity on appropriate sites within the Smithfield and Barbican Key Area of Change.
27. In the London Borough of Camden Local Plan 2017, the Chancery Lane, Holborn and High Holborn area known simply as 'Holborn' is recognised as one of the boroughs six identified 'Growth Areas' (see Map 2). The area is predominantly commercial and the High Holborn area and west of here 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. The draft new Local Plan does not use the term 'growth areas' but continues to recognise that Holborn will be a focus for future development in

the south of the borough. The emerging City Plan 2040 has identified 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 between occupiers in the area to deliver improvements and more flexible use of some buildings whilst retaining a predominance of commercial uses which complement the City's business focus. To assist with the development of a coherent vision for the area, the City Corporation will support the work of the Fleet Street Quarter BID. The BID is keen to explore ways in which Fleet Street can act as a vibrant spine for the area, while improving its links with other parts of the City including the area up to High Holborn and access to the riverside.

Open Spaces

28. Hampstead Heath is the largest open space in the London Borough of Camden and is managed and owned by the City of London Corporation. This open space 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.

Tall buildings/protected views

29. Camden and the City of London Corporation will continue to work together to ensure that tall buildings are in suitable areas where adverse impacts on local townscape character and the wider skyline can be prevented. The City Plan 2040 sets out a comprehensive approach to managing tall building proposals in the Square Mile. Tall buildings in the City are defined as those exceeding 75m AOD in height. Strategic Policy S12 identifies locations (City Cluster and Fleet Valley) and heights for tall buildings areas in the City where tall building development will be considered appropriate. This policy has been informed by detailed heritage impact assessments and strategic visual impact assessment, which demonstrates how the proposed massing of tall buildings in these areas could potentially impact the strategic landmarks and the wider City and pan-London skyline.
30. Protected views is an important strategic planning matter because 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 within the respective views. 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.

Governance arrangements

31. This Statement has been informed by ongoing engagement between Camden and the City of London (Refer to 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).

32. 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.
33. Officers in each local authority will feedback 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

34. 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 call for views - Nov 2022 Draft Local Plan (incorporating site allocations) - January 2024	Late 2024	Mid 2025
City of London Corporation	Local Plan - January 2015	Issues and Options – Sept 2016 Draft Plan - Nov 2018	March 2021 March/April 2024	Autumn 2024


Signatures

35. 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: Brian O'Donnell

Position: Strategic Lead - Planning Policy and Implementation

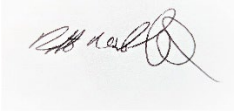
Signature: 

Date: 4 April 2024

CITY OF LONDON CORPORATION

Name: Rob McNicol

Position: Assistant Director (Policy and Strategy)

Signature: 

Date: 2024

Appendix 1 – Liaison meetings between the City of London and Camden

Date	Title/Purpose	CoL Officers	LBC Officers	Key actions
29th April 2015	London Borough of Camden, London Borough of Islington and CoL DtC meeting	Peter Shadbolt, Janet Laban	Brian O'Donnell, Kate Goodman	Discussed progress of Local Plans.
15th March 2016	London Borough of Camden, London Borough of Islington and CoL DtC meeting	Adrian Roche, Janet Laban	Brian O'Donnell, Cem Erkmen	Discussed progress of Local Plans.
30th June 2017	London Borough of Camden, London Borough of Westminster, Royal Borough of Kensington and Chelsea and CoL DtC meeting	Aidrian Roche, Lisa Russell, Jonathan Blathwayt	Brian O'Donnell, Rob Farnsworth	Discussed progress of Local Plans.
15th November 2018	London Borough of Camden and CoL DtC meeting	Adrian Roche	Brian O'Donnell, Rob Farnsworth, Kate Goodman	Discussed issues relevant to both boroughs.
23rd June 2020	London Borough of Camden and CoL DtC	Adrian Roche, John Harte	Brian O'Donnell, Rob Farnsworth, Kirsty Paul	Discussed issues relevant to both boroughs.
21 June 2021	London Borough of Camden and CoL DtC	Adrian Roche	Brian O'Donnell, Kate Goodman	Discussed issues relevant to both boroughs.
21st October 2022	London Borough of Camden and CoL DtC meeting	Garima Nayyar, Peter Shadbolt	Rebecca Burden, Brian O' Donnell	Discussed issues relevant to both boroughs.
24th November 2023	London Borough of Camden and CoL DtC meeting	Garima Nayyar, Lisa Russell	Rebecca Burden, Brian O' Donnell, Andrew Triggs	Discussed progress of Local Plans and SoCG