

City of London Local Plan
City Plan 2036
Proposed Submission Draft
Duty to Cooperate Statement



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Introduction

The City of London Corporation is the governing body of the Square Mile and is the smallest of the 33 local authorities in London. The City is located on the north bank of the River Thames in central London within the Central Activities Zone (CAZ) and is bordered by the boroughs of Camden, Hackney, and Islington to its north, Westminster to the west, Tower Hamlets to the east and Southwark and Lambeth to the south. The City is the ancient core of London with a rich legacy of history and is one of the world's leading financial and professional services centres. Consequently, it is unique in having a daytime working population of over 500,000 people, compared to a small residential population of approximately 8,000 people.



Figure 1: Location of the City of London and its neighbouring authorities

The City of London Local Plan (City Plan 2036) is a plan for the future development of the City of London until 2036, setting out what type of development the City Corporation expects to take place and where. It will replace the adopted City of London Local Plan 2015.

The Localism Act 2011 introduced a duty to cooperate in relation to the preparation of local plans and other statutory planning policy documents which raise strategic issues. The duty applies to local planning authorities and to other prescribed bodies. It came into effect in November 2011.

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Local planning authorities and other prescribed bodies are required to engage “constructively, actively and on an ongoing basis” in orders to maximise the effectiveness of policies for strategic matters in plan-making. Strategic matters are defined as “sustainable development or use of land that has or would have a significant impact on at least two planning areas”. Examples include the provision of new housing across a wider housing market area and enabling sufficient waste sites in a sub-region.

In London, unlike in much of England, local plans are prepared in the context of a regional spatial development strategy known as the London Plan which is produced by the Mayor of London. The City’s Local Plan, like those of the London boroughs, must be in general conformity with the London Plan. The London Plan forms part of the statutory development plan for the City of London, along with the City’s Local Plan. City Plan 2036 has been prepared in the context of a full review of the London Plan, which culminated in the publication of the new London Plan on 2nd March 2021.

During the preparation of City Plan 2036, the City Corporation has liaised closely with neighbouring London Boroughs, the Mayor of London, and other public bodies to cooperate on cross-boundary and strategic planning matters. Regular meetings and working groups have been taken place to discuss cross-boundary issues and the City Corporation has agreed a number of Statements of Common Ground with key partners.

This report provides details of activities undertaken by the City Corporation to comply with the duty to cooperate, both generally in how it engages with relevant bodies on strategic planning issues, and specifically in relation to the preparation of City Plan 2036. The report is structured in the following sections:

Section 1: *Introduction and legal context* outlines the legal and regulatory requirements relating to the duty to cooperate.

Section 2: *Consultation and engagement* outlines how the City Corporation has engaged with other local planning authorities and the prescribed bodies.

Section 3: *City Plan 2036* describes how the duty to cooperate has been met during the preparation of City Plan 2036.

Section 4: Conclusion

Appendix 1: Meetings with duty to cooperate bodies since January 2015



Section One: Legal and policy context

Duty to cooperate requirements

Section 110 of the Localism Act 2011 introduced a new Section 33A in the Planning and Compulsory Purchase Act 2004, which applies a legal duty referred to as a 'duty to cooperate' to the preparation of local plans and other statutory planning policy documents which raise strategic cross-boundary issues. This statutory duty applies to local planning authorities and to other prescribed bodies. It came into effect in November 2011.

Local planning authorities and other prescribed bodies are required to engage "constructively, actively and on an ongoing basis" in order to maximise the effectiveness of policies for strategic matters in plan-making. Strategic matters are defined as "sustainable development or use of land that has or would have a significant impact on at least two planning areas".

While the duty to cooperate is not a duty to agree, local planning authorities are required to make every effort to secure the necessary cooperation on strategic cross-boundary matters before they submit their local plans for examination. Local planning authorities are also required to consider joint approaches to relevant activities, including plan making. Compliance with the duty is a legal test that is considered by the appointed Inspector as part of a local plan examination.

National Planning Policy Framework

The national policy context is provided by the National Planning Policy Framework (NPPF), February 2019 and the national Planning Practice Guidance (PPG). The NPPF is prepared by the Ministry of Housing, Communities and Local Government to set out the planning policies for England and how these are to be applied. The NPPF emphasises the importance of sustainable development that must be taken into account when preparing a local plan.

NPPF paragraph 24 indicates that local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

NPPF paragraph 26 states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. 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.

In order to demonstrate effective and on-going joint working, paragraph 27 of the NPPF requires strategic policy-making authorities to prepare and maintain one or more statements of common ground, which document the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

NPPF paragraph 20 indicates that strategic policies “should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
 - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c) community facilities (such as health, education and cultural infrastructure);
- and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

Paragraph 21 of the NPPF states that plans should make explicit which policies are strategic policies, adding that strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies. Paragraph 22 indicates that strategic policies should look ahead over a minimum 15 year period to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

Planning Practice Guidance

Government Planning Policy Guidance (PPG) is updated regularly, most recently in July 2020 in relation to plan making. The PPG aims to ensure that planning decisions are taken in accordance with the development plan. The PPG states that local plans should set out the vision and framework for development and identify strategic priorities and policies. The provisions of the PPG must be taken into account in the preparation of local plans and are material to decisions on individual planning applications and appeals.

The PPG provides additional guidance on implementation of the duty to cooperate, including how it applies to the other bodies prescribed in the regulations. It indicates that all parties should approach the duty in a

proportionate way, tailoring cooperation according to where they can maximise the effectiveness of plans. The PPG outlines how the duty will be considered at local plan examinations, highlighting that as the duty to cooperate relates to the preparation of the plan it cannot be rectified post-submission.

The PPG confirms that the duty to cooperate applies in London and other combined authority areas. Within these areas local planning authorities are required to cooperate with each other, county councils, other local planning authorities outside the combined authority area, and prescribed public bodies. The degree of cooperation needed between these parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy.

The PPG also provides more detail about the statement of common ground, indicating that this is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters and that it forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.

The PPG outlines the scope of what a statement of common ground is expected to contain, highlighting that the level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. Authorities are expected, wherever possible, to detail cooperation in a single statement. However, the PPG acknowledges that authorities may feel it is appropriate to produce more than one statement if this would be the clearest and most expedient way to evidence joint working. For example, multiple statements may be appropriate where authorities work in different groupings to address certain strategic matters.

The guidance indicates that the statement will need to cover the area of cooperation during plan-making, which will depend on the strategic matters being planned for and the most appropriate functional geographical area to gather evidence and develop policies to address these matters. Examples cited include housing market and travel to work areas, river catchments or landscape areas. In relation to London, the guidance clarifies that it is not expected that each London borough will be signatories on statements prepared for a spatial development strategy, or that the Mayor will be a signatory to each local planning authority's statement.

Organisations subject to the duty to cooperate

The duty applies to local planning authorities and county councils in England, together with certain other public bodies which are prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. The relevant prescribed bodies with which the City Corporation must co-operate are:

- The Mayor of London
- Transport for London
- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- Homes England
- Clinical Commissioning Groups that serve the City of London
- The Office of Rail Regulation
- The Highways Agency
- The Marine Management Organisation

Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty, but local planning authorities must cooperate with them and have regard to their activities when they are preparing their local plans, so long as those activities are relevant to plan-making.

The context within which the duty applies is different in London from the rest of the country because the Mayor of London performs the role of the strategic planning authority for the capital. The Mayor has to prepare a spatial development strategy, the London Plan, and to keep it under review. The London Plan addresses the strategic dimensions of planning in the capital. The City's Local Plan, like those produced by the London boroughs, must be in general conformity with the London Plan.

Section Two: Engagement with duty to cooperate bodies

The City Corporation undertakes regular liaison and cooperation with relevant local planning authorities and duty to cooperate bodies, the details of which are summarised below.

Local planning authorities

The City Corporation undertakes active and ongoing engagement with other relevant local planning authorities through a range of mechanisms, such as participating in regular partnership working groups and arranging and attending other formal and informal meetings to discuss matters of shared interest as summarised below (see also Appendix A– list of dates and meetings with Duty to Cooperate bodies)

London Councils

The City Corporation is a member of London Councils, an organisation representing all of London's local authorities. London Councils act as a voice for London authorities, for example, responding to proposals for reform of planning legislation and national guidance. The City Corporation is represented on key member level committees, including the Executive, Leaders Committee, and Transport and Environment Committee where London-wide and strategic issues of concern are considered. At officer level, the City Corporation has attended working group meetings on topics including planning policy, waste planning, biodiversity, transport and planning obligations and contributes where appropriate to the preparation of briefing materials and documents prepared by London Councils.

Planning Officers' Society (POS)

The Association of London Borough Planning Officers (ALBPO) is) is the London committee of the POS. Meetings of the ALBPO's Development Plans Sub Group and Policy Officers' Subgroup are held six times a year and are attended by planning officers from the City Corporation. The ALBPO provides a forum for officers of all boroughs to discuss current issues and share expertise. Notes of the meetings are available.

City Corporation officers also attend meetings of the ALBPO Development Management Officers Group and regular meetings of the Planning Officers' Society to exchange information and expertise on a wider range of planning matters.

Neighbouring local planning authorities

The City is adjoined by seven local authorities: the City of Westminster and the London Boroughs of Camden, Islington, Hackney, Tower Hamlets, Southwark and Lambeth. The City Corporation works closely with these authorities. Regular liaison meetings are held between planning policy officers of the City Corporation and their counterparts in the neighbouring boroughs at which cross-boundary issues relating to local plan preparation, other policy documents and occasionally major planning applications of strategic importance are discussed. Meetings generally take place at least annually, and may be more frequent depending upon local plan or London Plan progress, and major planning issues.

Other London boroughs

The City Corporation participates in a range of meetings and forums with other London boroughs about strategic planning issues, including the London Waste Planning Forum, the South East London Waste Planning Group, and the Central London North Flood Risk Partnership Group. Other London boroughs and Mayoral Development Corporations (MDCs) which have requested to be included on the City Corporation's planning policy database are informed and invited to comment at each main consultation stage of the preparation of the Local Plan and SPDs. The City Corporation endeavours to engage constructively in responding to consultations from London boroughs and MDCs on policy and development management matters.

Local authorities in south-east England

The City Corporation engages directly with waste planning authorities outside London that have been identified as receiving waste arisings from the City, as set out in Section Three of this report.

Prescribed bodies

Mayor of London / Greater London Authority (GLA)

The Mayor of London has a statutory duty to prepare and keep under review the London Plan. The new London Plan was published on 2nd March 2021.

The London Plan sets out strategic policies that the City Corporation is required to take into account in preparing its local plan and in making decisions on planning applications. It includes employment projections, housing targets and waste apportionment targets for the City and each London borough. The London Plan is accompanied by supplementary planning guidance and best practice guidance.

The Mayor consults and co-operates with local planning authorities in the regions surrounding London in the preparation of the London Plan. He has established a

cross-boundary working group with county and district authorities from the wider southeast to enable discussion of strategic planning issues.

The Mayor has prepared a London-wide Community Infrastructure Levy (CIL) to part fund the delivery of Crossrail and also requires contributions towards the cost of Crossrail through Section 106 planning obligations on certain developments. Where developments in the City of London are required to pay Mayoral CIL and/or Mayoral Section 106 contributions, the City Corporation collects these payments on behalf of the Mayor.

The City Corporation works closely with the Mayor in the preparation of the London Plan and the evidence base that underpins it, and in the preparation of the City's Local Plan. Officers from the City Corporation attend regular meetings and consultation events on the London Plan and meet with GLA officers to discuss City Local Plan matters at least annually. The City Corporation also provides the GLA with a range of local data relating to the City of London, including through the London Development Database, and participates in meetings regarding key pieces of London-wide evidence.

Transport for London (TfL)

TfL is a functional body of the GLA, and its board is chaired by the Mayor. It is responsible for implementing the Mayor's Transport Strategy; for the strategic aspects of transport planning in London; for the provision of most transport services, including the London underground, buses and some rail services; and operation and maintenance of London's strategic road network.

The City Corporation works closely with TfL on land use planning and transport planning issues, public transport operation and investment, roads maintenance and through Mayoral funding for transportation and public realm enhancement schemes in the City. This co-operation includes regular liaison meetings with the TfL Borough Planning Team to discuss progress on planning policy, major planning applications and highways and public realm enhancement projects. City Corporation officers also attend regular Mayoral CIL liaison meetings with the London boroughs.

London Economic Action Partnership (LEAP)

The London Economic Action Partnership (LEAP) is the local enterprise partnership for London. The LEAP is an advisory body to the Mayor. This differs from the rest of England, where local enterprise partnerships are autonomous. Co-operation with the Mayor thus includes cooperation with the LEAP. The City Corporation and London boroughs mainly engage with the LEAP through London Councils.



The Environment Agency

The Environment Agency is the government's advisor on environmental protection and improvement, including waste, contaminated land, water quality and flood risk issues. The City Corporation works closely with the Environment Agency on the assessment and mitigation of flood risk in the City and surrounding boroughs, through the City of London Strategic Flood Risk Assessment and Flood Risk Management Strategy and through involvement in partnership working groups such as the London Drainage Engineering Group (LoDEG) and the Central London North Flood Risk Partnership Group. The City Corporation is actively participating in the ten-year review of the Thames Estuary 2100 Plan and is undertaking research into the practical implications of raising the City's flood defences in line with the TE2100 Plan, which has included collaborative workshops with the EA and other riparian local authorities in central London.

Historic England

Historic England is the government's advisor on heritage assets and the historic environment. The City contains over 600 listed buildings, 27 conservation areas, 48 scheduled monuments and 4 historic parks and gardens. It is also one of the most archeologically important areas in Britain. The City Corporation has a close working relationship with the London Regional Office of Historic England on planning policy issues, transportation and public realm enhancement and the determination of planning applications.

The City Corporation co-operates with Historic England, Historic Royal Palaces, central Government and the London Boroughs of Southwark and Tower Hamlets, through the Tower of London World Heritage Site Consultative Committee. City Corporation officers commented and advised on the Tower of London World Heritage Site Management Plan, adopted in 2016.

Natural England

Natural England is the government's advisor on nature conservation and countryside issues, including national trails. The City's riverside walk forms part of the Thames Path National Trail. The City Corporation consults with Natural England on proposals impacting on the Thames Path, alongside the Local Plan and Supplementary Planning Documents. The City Corporation engaged closely with Natural England when preparing the Habitats Regulation Assessment (HRA) for the adopted City Local Plan 2015 and has done so again through the Integrated Impact Assessment (which incorporates the HRA) of the draft City Plan 2036.

The Civil Aviation Authority (CAA)

The flight paths of Heathrow Airport and London City Airport cross the City and the City Corporation engages with the CAA and the airports directly on development in the City which might impact on flight paths and operation of the



airports, ensuring that required safeguarding zones are identified on the Local Plan policies map. The City Corporation consults the two airports on planning policies and on relevant planning applications for tall buildings in the City.

City and Hackney Clinical Commissioning Group

Clinical Commissioning Groups (CCGs) came into being on 1st April 2013. On the same date responsibility for public health was transferred to local authorities and the City Corporation set up a Health & Wellbeing Board to administer this function. A representative of the City and Hackney CCG is a member of the Board. The Board was engaged in the preparation of the adopted Local Plan 2015, and planning policy officers regularly attend meetings of the Board to update it on progress with the Local Plan review. Planning policy officers have also met directly with representatives of the CCG to discuss the implications of proposed growth for the provision of primary healthcare facilities.

Office of Rail Regulation

The Office of Rail Regulation (ORR) is a consultee for the Local Plan and other planning policy documents. There has been limited direct involvement with the ORR, but the City Corporation seeks to engage where appropriate with Network Rail and individual Train Operating Companies, for instance attending meetings with rail company c2c regarding their proposals for improvements to Fenchurch Street Station. The City Corporation regularly meets and liaises with Crossrail Ltd concerning the development of the Elizabeth Line, oversight development and public realm enhancements around Elizabeth Line stations.

Highways Agency

There are a number of highway authorities with responsibility for streets within or leading to the City. The seven neighbouring boroughs are local highway authorities for their areas; TfL is highway authority for major roads, with responsibility for certain streets within the City; and the Highways Agency is responsible for major routes in Greater London (although none are within or near the City). The City Corporation works closely with neighbouring boroughs and TfL on highways improvements that cross the City's boundaries, on the development of planning policy and transportation planning documents and on major planning applications. Liaison also occurs in relation to planning for major public events that require cross-London road closures, such as the London Marathon.

The Marine Management Organisation (MMO)

As the City lies on the tidal Thames its planning policies must take account of the UK Marine Policy Statement which is produced by the MMO. The MMO is preparing marine plans for all waters surrounding England and the Thames is included in the emerging South East Marine Plan. City Corporation planning officers have attended and contributed to seminars held by the MMO for London

planning authorities. The MMO is consulted in the preparation of the Local Plan and on major planning applications affecting the River Thames in the City.

Other Prescribed bodies

There are some prescribed bodies set out in the national regulations, which are not considered to be relevant to the Duty to Co-operate as it applies to the City of London:

- **Integrated Transport Authorities.** It is not considered that the City's Local Plan raises strategic issues affecting any of the six ITAs in England. Transport for London performs an analogous role to an ITA within Greater London.
- **Homes England** does not generally operate in London. The Mayor is responsible for strategic housing matters within Greater London.
- **Local Nature Partnerships.** The All London Green Grid is facilitated by the Mayor of London and is recognised by Defra as the Local Nature Partnership for London, but it does not have a governance structure that allows it to speak with a single voice on matters such as statutory consultations. The City Corporation actively participated in the preparation of the All London Green Grid Supplementary Planning Guidance prepared by the Mayor.

Locally important stakeholders

City Corporation officers also have meetings to discuss strategic planning matters, including planning polices and major planning applications, with a range of organisations that are not prescribed bodies under the duty to cooperate but are important stakeholders in the context of the City of London. They include:

- City Property Association;
- Barbican Association;
- Historic Royal Palaces;
- Surveyor to the Fabric of St Paul's Cathedral;
- Port of London Authority.

Section Three: How the Duty to Cooperate is being met in the preparation of City Plan 2036

Introduction

This section sets out the City Corporation has complied with the duty to cooperate during the review of the Local Plan. The City's current Local Plan was adopted in January 2015 and in October that year the City Corporation's Planning and Transportation Committee agreed to commence work on a full review of the adopted Local Plan, which will look forward to 2036 and will be titled City Plan 2036. The preparation of City Plan 2036 has followed behind a full review of the London Plan, with three key stages to date:

- **Issues and Options:** consultation on key issues to be addressed in City Plan 2036 and emerging options ran between September and December 2016;
- **Draft Plan:** consultation on a full draft of City Plan 2036 ran between November 2018 and February 2019;
- **Publication:** work has progressed on a revised Proposed Submission Draft Plan which will be published for consultation in March-April 2021.

Liaison meetings with neighbouring boroughs

As mentioned earlier in this Statement, planning policy officers at the City Corporation meet with their counterparts in neighbouring boroughs on a regular basis. Some of these meetings are on a bilateral basis, while others involve groupings of three or more neighbouring authorities.

As well as providing updates and an opportunity for the exchange of information, these liaison meetings are used to discuss specific issues, such as potential policy approaches in emerging plans or major planning applications. In so doing, they help ensure that the City Corporation is aware of the rationale for the policy priorities of its neighbouring boroughs and vice versa, and that cross-boundary planning issues are considered to ensure effective strategic planning. Some of these meetings have helped to inform the responses of neighbouring boroughs to consultations on City Plan 2036, along with the City Corporation's comments on their respective Local Plan consultations.

A record has been kept of all meetings with neighbouring boroughs since the adoption of the current City of London Local Plan in January 2015. Details of these meetings are summarised in the table at Appendix 1 of this report.

Table 1 summarises the current status of the local plans being produced by neighbouring boroughs.

Authority	Local Plan status
City of Westminster	The adopted Local Plan is the Westminster City Plan (2016) and saved policies from the Unitary Development Plan. A new City Plan 2019-2040 is being prepared and was submitted for examination in November 2019. Main Modifications were published for consultation in November 2020.
London Borough of Southwark	The adopted Local Plan comprises the Core Strategy (2011) and saved policies within the Southwark Plan (2007). The New Southwark Plan is being prepared and was submitted for examination in January 2020.
London Borough of Islington	The adopted Local Plan comprises the Core Strategy (2011), Development Management Local Plan (2013), Site Allocations Plan (2013) and Finsbury Local Plan (2013). A new Islington Local Plan is being prepared and was submitted for examination in February 2020.
London Borough of Tower Hamlets	The Tower Hamlets Local Plan 2031 was adopted in January 2020.
London Borough of Camden	The Camden Local Plan was adopted in July 2017 and covers the period 2-16-2031.
London Borough of Hackney	The Hackney Local Plan 2033 was adopted in July 2020.
London Borough of Lambeth	The adopted Local Plan is the Lambeth Local Plan 2015. A partial review of the adopted Local Plan is being undertaken and the Draft Revised Lambeth Local Plan was submitted for examination in May 2020. Main Modifications were published for consultation in February 2021.

Table 1: Current status of local plans being produced by neighbouring boroughs to the City of London

Other partnership working groups and meetings

The City Corporation actively engages in partnership working on policy issues such as waste and flood risk that by their nature have cross-boundary implications. A number of these partnership arrangements are listed in Section

One of this report and details of meetings attended can be found in the table at Appendix 1.

Specific meetings have been arranged on a bilateral basis with key partners under the duty to cooperate to discuss the review of the City's Local Plan. Examples include meetings with officers of the GLA, TfL, Historic England, and the Environment Agency. These meetings are also listed in the table at Appendix 1.

Evidence base for City Plan 2036

The Local Plan needs to be based on robust evidence. The City Corporation has an extensive evidence base and publishes regular Local Plan monitoring reports to assess how the adopted Local Plan policies are being implemented. The policies in City Plan 2036 have been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan.

In some cases, additional studies have been undertaken to provide relevant and up-to-date evidence to support and justify the proposed policies. Where relevant, the City Corporation has engaged with partners under the duty to cooperate during the preparation of evidence, with the scope of engagement depending on the likely impacts of the subject matter. Key examples are provided below.

Strategic Housing Market Assessment (SHMA)

Consultancy GL Hearn were commissioned by the City Corporation to prepare the City of London SHMA. The SHMA final report was completed in June 2016, but an addendum was completed in September 2016 to consider updated population and household projections published during the summer of 2016.

London is different to other parts of the country in the sense that housing targets are set by the London Plan, which makes clear that for planning purposes London should be treated as a single housing market. There are, however, differences in the type, quality and cost of housing across London, which are reflected in more finely grained SHMA's for specific areas.

Due to the unique nature of the City of London, with its large working population compared to its small resident population, the methodology of the City's SHMA needed to be tailored to the specific circumstances of the City. This made it very difficult to prepare a joint SHMA with neighbouring boroughs who have a much greater resident focus. In addition, neighbouring boroughs were either at different stages of plan preparation or had already commissioned their own SHMA's covering geographic areas that did not include the City.

Nonetheless, it was important to provide an opportunity for the GLA and neighbouring boroughs to comment on the draft findings of the SHMA and to raise any questions or concerns they may have had before the report was finalised. Accordingly, the GLA and neighbouring boroughs were consulted on a draft SHMA report, a copy of which was sent to each of those organisations in April 2016. No comments were received from any of the neighbouring boroughs, but the GLA made some comments on behalf of the Mayor. GL Hearn met with GLA officers in May 2016 to discuss their comments, and subsequently amended the final SHMA to address the points raised. In particular, an affordability uplift of 20% was incorporated as recommended by GLA officers.

Waste Arisings and Waste Management Capacity Study

The City of London is a waste planning authority and, as such, has a statutory duty to prepare a waste plan in line with the Waste Framework Directive (2008). This is fulfilled through the inclusion of waste policies in the City Plan 2036. The London Plan apportions London's household and commercial/industrial waste arisings across all boroughs and the City, and expects each local authority to identify land to manage their apportionment.

Consultancy Anthesis were commissioned by the City Corporation to prepare a study of existing and projected future waste arisings, together with an assessment of routes and destinations for waste management alongside any waste management capacity within the City itself. The study was completed in August 2016.

During the preparation of this study, a copy of the draft report was sent to all waste planning authorities that were identified as having received more than 1,000 tonnes of waste from the City in 2014, together with the GLA and the Environment Agency. A response form was also sent asking for details of any problems that could arise in accommodating waste from the City up to 2036, and for any inconsistencies with their own waste plans to be highlighted.

Responses were received from nine waste planning authorities, plus the GLA and the Environment Agency. As a result of the information received a number of changes and updates were made to the final report, including the addition of a table identifying those sites which currently receive waste from the City but may potentially be unavailable before 2036.

Other evidence studies

Other evidence studies commissioned for City Plan 2036 have generally been undertaken without direct input from duty to cooperate bodies. This is partly because neighbouring boroughs have been at different stages of plan preparation but also reflects the unique nature of the City of London, which means that

standard methodologies often need to be adapted to reflect the City's particular circumstances. For instance, the Retail Needs Assessment, published in November 2017 with an update in January 2021, was based on a bespoke approach to take account of the City's substantial working population.

In some cases, evidence studies have been commissioned by the City Corporation in order to apply strategic policies effectively to the City's unique circumstances. For example, the Urban Greening Factor Study, published in July 2018, was undertaken to explore how the Urban Greening Factor requirement in the new London Plan could be applied in the City of London and was therefore based on case studies of specific development schemes in the City.

In other cases, such as the London Strategic Housing Land Availability Assessment 2017, evidence was gathered at a London-wide level but City Corporation officers actively participated in the process of assessing land capacity and suitability for housing in collaboration with officers at the GLA.

Integrated Impact Assessment

The City Plan 2036 has been shaped by an Integrated Impact Assessment (IIA) process. This brings together Sustainability Appraisal, Equalities Analysis Health Impact Assessment and Habitats Regulation Assessment Screening into a single framework. The IIA of City Plan 2036 has been an iterative process undertaken at each main stage of the plan-making process, which has helped inform the development and refinement of options and detailed policies.

The first stage of the IIA was the production of a Scoping Report, which set the context and baseline, identified other relevant plans and programmes, defined the IIA objectives and defined the framework for the assessments. An initial draft of the Scoping Report was produced in January 2016 and comments were invited from the three statutory environmental consultation agencies (Environment Agency, Historic England and Natural England), together with the Mayor of London and neighbouring boroughs.

Comments were received from the Environment Agency, Historic England and Natural England, which resulted in a number of changes being made to the Scoping Report before it was published for wider public consultation alongside the City Plan Issues and Options document in September 2016. Only two comments were received on the updated Scoping Report at Issues and Options stage, from the Environment Agency and Historic England. The City Corporation's response to those comments was recorded in Appendix 3 of the IIA, which was published for consultation alongside the Draft City Plan in November 2018 and will be published as an updated and revised Environmental

Report to accompany consultation on the Proposed Submission Draft City Plan 2036 in March 2021.

Issues and Options consultation

The first significant milestone in the preparation of City Plan 2036 was to gauge the views of interested organisations and the wider public on the key planning issues facing the City. This was known as the Issues and Options stage. The City Corporation published its Issues and Options document for consultation between 19th September 2016 and 2nd December 2016. Consultation questions were phrased in an open style to encourage a full debate and not preclude respondents from coming up with their own ideas and suggestions. Responses could be made using an online questionnaire, by email or post.

Each of the Duty to Cooperate bodies identified in the introduction to this report were notified at the start of the consultation period. Notifications were sent to all local planning authorities in London, including the 32 London boroughs and the two Mayoral Development Corporations. In addition, each of the waste planning authorities that were consulted on the City's Waste Arisings and Waste Management Capacity Study were sent a specific email and questionnaire regarding the Issues and Options consultation.

Consultation responses from duty to cooperate (DtC) bodies

Comments on the Issues and Options were received from:

- Greater London Authority (GLA) on behalf of the Mayor of London;
- Transport for London (TfL);
- London Borough of Tower Hamlets;
- London Borough of Islington;
- London Borough of Hackney;
- London Borough of Camden;
- London Borough of Bexley;
- Royal Borough of Kensington and Chelsea;
- North London Waste Plan Group;
- Slough Borough Council;
- Thurrock Council;
- Environment Agency; and
- Historic England.

Responses were also received from organisations which are not covered by the statutory duty, but are important stakeholders in the City. Examples include the City Property Association, Historic Royal Palaces, the Museum of London, the Barbican Association and the Chapter of St Paul's Cathedral.

Cross-boundary policy issues raised

Table 2 below summarises the main cross-boundary policy issues raised in the consultations responses, ordered in terms of the number of comments received from DtC bodies.

Strategic Issue	DtC bodies	Summary of issues raised
Waste	Mayor/GLA Environment Agency LB Bexley Royal Borough of Kensington and Chelsea North London Waste Plan Group Slough Borough Council Thurrock Council	<p>There was general recognition that due to the unique nature of the City, it will be necessary for it to continue to rely on waste management facilities elsewhere.</p> <p>It was pointed out that waste capacity at recipient authorities is diminishing due to landfill closures. Thurrock for instance provided a list of landfill sites known to be ceasing operation by 2036. Much of the waste recently exported to Thurrock from the City and elsewhere in London has been Construction, Demolition and Excavation Waste, for which there is no apportionment in the London Plan.</p> <p>All DtC bodies supported the adoption of measures to promote waste reduction and the circular economy as far as feasible within the City.</p> <p>Support for the continued safeguarding of Walbrook Wharf as a waste site, with recognition that transportation of bulky waste by water helps to divert such waste away from the roads and that suitable sustainable transport hubs are in short supply in central London.</p>
Tall buildings and protected views	Mayor/GLA Historic England LB Tower Hamlets LB Hackney LB Islington Environment Agency	<p>The GLA supported the City’s approach to tall buildings provided it is backed by clear locational guidance and robust policy to secure high quality design as set out in the London Plan.</p> <p>Tower Hamlets expressed concerns about the potential impact of the intensification of the City’s Eastern Cluster on the Artillery Passage Conservation Area and the Tower of London.</p>

		<p>Hackney expressed a desire to work with the City with regard to the development of tall buildings in the vicinity of Liverpool Street. Islington commented that future proposals are likely to be more appropriate where they correlate with existing clusters.</p> <p>Historic England supported the retention of current protected views and suggested that policy consideration be given to views identified as part of conservation area appraisals, both within the City and from outside looking back in.</p> <p>Historic England noted that 3D modelling is being applied to the Eastern Cluster and advocated the same rigorous approach to proposals elsewhere in the City. There is a need to ensure that tall buildings proposals consider the significance of heritage assets outside as well as inside the City, highlighting the setting of the Tower of London World Heritage Site in particular.</p>
Flood risk	<p>Mayor/GLA Environment Agency Royal Borough of Kensington and Chelsea LB Camden Historic England</p>	<p>No specific concerns raised.</p> <p>The GLA indicated that the approach to flood risk management is forward looking and seeks to address the particular challenges flood risk poses to the City.</p> <p>General support for the application of SuDS standards to smaller developments, and for policies setting out the flood resistance and resilience measures required for development in the City Flood Risk Area.</p>
Offices	<p>Mayor/GLA TfL LB Hackney LB Islington</p>	<p>The GLA and TfL considered that the agglomeration of office uses in the City's commercial core should be protected, with the GLA adding that policies to encourage a diverse range of employment uses would be welcomed.</p> <p>Hackney referred to the relationship between the City and the City Fringe, noting that employment demand and supply in and around the City Fringe and Shoreditch will be an important issue for both Local Plans.</p>

		<p>Hackney interested to see emerging evidence regarding the growth of SMEs and technology businesses within the City, and suggested that affordable workspace is an issue the City Corporation may wish to explore. Also expressed a desire to work with the City on the introduction of an Article 4 Direction to remove permitted development rights for office to residential conversions.</p> <p>Islington referred to significant levels of job growth projected in Islington as well as in the City and advocated a balanced approach which maximises office development to meet jobs growth, coupled with careful planning for complementary uses.</p>
Sustainability and climate change	Mayor/GLA LB Islington Environment Agency Historic England	<p>Majority of comments did not relate to cross-boundary matters.</p> <p>The GLA and Islington expressed support for district heat networks, which may cross administrative boundaries, with Islington additionally supporting the inclusion of policies promoting smart grid technologies and green infrastructure within the Plan.</p>
Thames and the Riverside	Mayor/GLA TfL Environment Agency Historic England	<p>The GLA welcomed the promotion of river passenger services and was generally supportive of expanding river freight, while commenting that it is difficult to see a lot of scope for this at present other than during the construction/demolition phases of riverside development.</p> <p>TfL was supportive of increased passenger and freight movement on the river, including encouragement of greater use of the river for deliveries and servicing during construction and subsequently. TfL also supported further investigations into bringing piers back into operation and mentioned a Pier Strategy that it is working on with the PLA.</p> <p>The Environment Agency and Historic England pointed to the River Thames as a strategic asset for the City</p>

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		<p>The EA supported maintaining the openness of the river for reasons including biodiversity and heritage interest and the need to maintain access for maintenance and improvements to flood defences.</p>
<p>Cultural Hub/ Hotels</p>	<p>Mayor/GLA LB Islington LB Hackney</p>	<p>The GLA welcomed the provision of hotels in principle, although this needs to be balanced against the other functions of the CAZ. Areas around the fringes of the City with good public transport access were suggested as likely to be best able to support this fine balance.</p> <p>The GLA expressed support for further growth of the City’s night time economy, but added this would need careful consideration with adjoining authorities where such activities are close to the City’s boundary. Islington and Hackney noted that development of the Cultural Hub in the north of the City will attract more visitors and will potentially increase demand for hotels and other facilities in and around this area. Islington stated it has limited capacity for new hotels beyond those identified in the development pipeline.</p> <p>Hackney welcomed the City’s aspiration for a coordinated approach with areas beyond the City’s boundary on these issues.</p>
<p>Housing</p>	<p>Mayor/GLA TfL LB Tower Hamlets</p>	<p>The GLA welcomed the City’s commitment to meet its London Plan housing target, and favoured a continuation of the current policy approach to doing this, whereby new housing is provided in existing residential areas. TfL likewise recommended that residential development should be focused on existing residential areas, adding that the boundaries of those areas should be defined in the Plan. Tower Hamlets supported the City meeting the strategic housing target in the London Plan.</p>
<p>Retail</p>	<p>LB Tower Hamlets</p>	<p>Tower Hamlets suggested a new retail link north of the Liverpool Street Principal</p>

	<p>LB Hackney LB Islington</p>	<p>Shopping Centre to promote movement between there and Spitalfields Market. Hackney noted that the Shoreditch Area Action Plan will explore the relationship between the City’s Principal Shopping Centres and the City Fringe. Islington commented that while having a baseline level of A1 uses is important to ensure that basic retail needs are catered for, it seems sensible to plan for flexibility so that retail areas can adapt to changing circumstances.</p>
<p>North of the City</p>	<p>Mayor/GLA LB Hackney LB Islington</p>	<p>The GLA stated the identification of areas around the Crossrail Stations is likely to be a useful focus for further development, adding that particular attention should be paid to linking to strategies in the adjoining boroughs. Hackney expressed interest in being kept updated regarding development activity around Liverpool Street Station and Broadgate, particularly in relation to intensification of business and employment and technology sector development in this area. Islington welcomed recognition that there is potential for further business intensification around Liverpool Street/Broadgate linking with the Tech City area and would be supportive of policies that recognise the needs of technology sector companies.</p>
<p>Eastern Cluster</p>	<p>Mayor/GLA Historic England TfL</p>	<p>The GLA supported intensification of built development, including a concentration of tall buildings. Strengthening pedestrian connections to the east and into Tower Hamlets would be a positive strategic objective. Historic England advocated use of the outputs from 3D modelling to define with greater clarity the development and design parameters for future tall building proposals. HE is keen to ensure that both the defined</p>

		<p>local setting and wider setting of the Tower of London World Heritage Site is recognised and used to inform the management of the Cluster.</p> <p>TfL advocated an emphasis on measures to improve the capacity of the public realm to cope with increased pedestrian movement in the Eastern Cluster, but did not raise any specific cross-boundary issues.</p>
Historic Environment	Mayor/GLA Historic England	<p>The GLA and Historic England highlighted the need to pay careful attention to the setting of the Tower of London.</p> <p>The GLA indicated that the City Corporation should co-operate closely with Tower Hamlets on the setting of the Tower.</p> <p>Historic England supported the inclusion of a policy in the City's Local Plan that recognises the Outstanding Universal Value and setting of the World Heritage Site.</p>
Aldgate	Mayor/GLA LB Tower Hamlets	<p>The GLA commented that the nature of the Aldgate area is changing and there is further scope for redevelopment, adding that synergies/links to the immediately adjoining areas with Tower Hamlets are actively encouraged.</p> <p>Tower Hamlets agreed with the scope for improved movement around Aldgate and supported improvements to the public realm as well as dedicating more space to pedestrians and cyclists.</p>
Transport	TfL	<p>TfL supported in principle the use of consolidation centres and off-peak servicing to help mitigate congestion, and potential measures to reduce exposure to air pollution. Given space constraints within the City and elsewhere in the CAZ, reliance upon distant consolidation centres is likely to be necessary but will need careful management to be successful and to avoid unintended side effects.</p>

Social and community infrastructure	Mayor/GLA	The GLA stated that, given the unique nature of the City, it is acceptable to consider shared provision with adjoining London boroughs.
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Table 2: Summary of issues raised by DfC bodies at City Plan 2036 Issues and Options consultation

In light of the consultation responses summarised above, the key duty to cooperate issues for the Draft Plan were considered to be as follows:

- Working with partners to meet the City’s London Plan waste apportionment up to 2036, while exploring opportunities to reduce the amount of waste currently generated in the City;
- Maintaining active engagement with waste planning authorities inside and outside London that receive significant quantities of waste from the City;
- Considering the impact of further tall buildings in the City on heritage assets both within and adjoining the City, especially the setting of the Tower of London World Heritage Site;
- Liaising with the GLA and neighbouring boroughs to consider what changes to policy may be required to reflect the evolving relationship between the office markets in the City and the City Fringe;
- Liaising with the GLA and neighbouring boroughs regarding the cross-boundary implications of the Cultural Hub proposals, particularly how to accommodate the demand for hotels and other visitor facilities;
- Considering the potential implications for areas outside the City of potential measures to reduce congestion and air pollution within the City, such as the use of consolidation centres and evening/nighttime deliveries;
- Liaising with the GLA on the London-wide Strategic Housing Market Assessment and the setting of housing development targets for the City in the London Plan;
- Continuing to work with neighbouring boroughs to deliver affordable housing and social and community infrastructure that cannot be accommodated within the City, either physically or viably;
- Working with partners to explore the potential for greater use of the River Thames for passenger and freight movements; and
- Considering opportunities for improved pedestrian connections between the City and adjoining areas.

The City Corporation held ongoing meetings and discussions with duty to cooperate bodies regarding the above issues, amongst other topics, during the preparation of a full draft version of City Plan 2036, as outlined in Appendix 1.

Draft City Plan 2036 consultation

The second significant milestone in the preparation of City Plan 2036 was consultation on a full draft version of the Plan, which took place over an extended period between 12th November 2018 and 28th February 2019. The timing of the consultation aligned with consultation on the City's draft Transport Strategy and the notification letters and emails sent out drew attention to both documents. Consultation responses could be made using an online questionnaire, by email or post.

Each of the Duty to Cooperate bodies identified in the introduction to this report were notified at the start of the consultation period. Notifications were sent to all neighbouring local planning authorities and to other London boroughs that had requested to be kept informed of the City's planning policy consultations under the GDPR regulations. In addition, each of the waste planning authorities that had received strategic amounts of waste from the City of London in 2017 were sent an email to alert them to the draft Plan consultation and were asked to confirm whether sites which have previously received City waste would remain available during the whole period of the City Plan to 2036.

Consultation responses from duty to cooperate (DtC) bodies

Comments on the draft Plan were received from:

- Greater London Authority (GLA) on behalf of the Mayor of London;
- Transport for London (TfL);
- London Borough of Tower Hamlets;
- London Borough of Islington;
- London Borough of Hackney;
- Surrey County Council;
- Historic England;
- Environment Agency;
- Natural England;
- Highways England; and
- Marine Management Organisation.

Given the nature of the consultation at draft Plan stage, most of the representations received were on specific points of detail rather than the broader thematic responses to the earlier Issues and Options consultation. Accordingly, the tables below set out how the key issues raised by each of the DtC bodies informed the preparation of the Proposed Submission Draft of City Plan 2036.

Mayor of London

Table 3 below sets out the key strategic issues raised by the Mayor of London and any changes which have been made to City Plan 2036 or the supporting evidence base as a result.

Policy / topic	Summary of key strategic issues raised by the Mayor of London	Outcomes
Housing Delivery	Welcome intention to meet Draft London Plan housing targets and to limit housing development to already established residential areas. The City Plan should reflect the Mayor's 50% strategic target for affordable housing and the threshold approach to viability.	Changes made to the City Plan include a requirement for the delivery of 50% affordable housing on public sector land and a requirement for the submission of a viability assessment and viability review where developments do not meet the requirements of the Mayor's threshold approach.
Healthy and Inclusive City	Pleased to see intention to work collaboratively with neighbouring authorities to deliver services efficiently but should also commit to regularly assessing the need for health and social care facilities locally and sub-regionally. Welcome policy on air quality but should go further by identifying Air Quality Focus Areas and adopting an air quality positive approach wherever possible.	Officers have met with the CCG and the City Plan refers to joint working with the CCG and other partners to regularly assess the need for health and social care facilities locally and sub-regionally. Air quality policy has been strengthened and encourages developments subject to an EIA to adopt an air quality positive approach wherever possible.
Offices	<p>1. Welcome intention to meet target of 2 million sq.m. of office space up to 2036, which will contribute towards projected 3.5 million sq.m. office demand in the CAZ and Northern Isle of Dogs in Draft London Plan. Further site level work should be set out to demonstrate this quantum will be delivered in the Plan period.</p> <p>2. City should seek to ensure it has sufficient capacity for industry and</p>	<p>1. The supporting evidence base for the Proposed Submission Draft City Plan provides further evidence on progress towards delivery of the office growth target in the Plan period.</p> <p>2. The City Corporation is actively pursuing measures to promote freight consolidation and zero emission last mile distribution. This includes policies in the City Plan and</p>

	logistics, including last mile distribution and freight consolidation to support business needs. This could be achieved through protection of industrial and distribution functions but also through provision of space in development proposals.	adopted Transport Strategy but also initiatives such as establishing micro consolidation centres in underused City car parks.
Retailing	Welcome strategic approach but limiting active frontages to retail uses only fails to recognise the contribution that wider town centre uses can bring. Strategic night-time classifications of the Barbican, Cheapside and Liverpool Street in Draft London Plan should be reflected in the City Plan.	Retail policies now incorporate much broader references to town centre uses and the new Class E with an emphasis on retaining active frontages. These strategic night-time economy classifications are now referenced in the City Plan.
Tall Buildings and Protected Views	<p>1. Consideration of the view of St Paul's from Fleet Street is welcome but policy should consider the impact of proposals on views along Ludgate Hill, which is part of the historic processional route.</p> <p>2. City may wish to consider if a tall building should be defined as lower than 75m in the Thames Policy Area to enable policy to apply to development that may have a significant impact on the river but is less than 75m high.</p> <p>3. To provide clarity the City should show on a map where tall buildings may be an appropriate form of development and indicate general building heights in these locations.</p> <p>4. Further work should be conducted to investigate the cumulative impact of tall building</p>	<p>1. Policy now refers to Ludgate Hill and this area is included in an enlarged Fleet Street and Ludgate Key Area of Change with policy references to the historic processional route.</p> <p>2. Since the riverside is covered by the St Pauls Heights and other protected views policy designations the height of buildings is already limited to much lower than 75m.</p> <p>3. Further details on development parameters will be set out in a forthcoming review of the Protected Views SPD.</p> <p>4. 3D modelling work is ongoing. Reference to the LVMF Protected Vista from Queens Walk and the White Tower Protected Silhouette of the Tower of London has been added to policy and this area is</p>

	development at the eastern edge of the City Cluster on the setting of the Tower of London WHS. The Protected Vista from Queens Walk to the Tower of London should result in limiting building heights in the background of the vista.	now shown as inappropriate for tall buildings.
City Cluster	While the ambition to accommodate significant growth in the cluster is welcomed, the City should take a more proactive approach towards the protection and conservation of its heritage assets. It should conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, including requiring relevant proposals to be supported by Heritage Impact Assessments. The image of the City Cluster Key Area of Change should be improved or the boundary set out on an updated policies map.	Various amendments have been made to the Proposed Submission Draft City Plan in relation to heritage assets, including reference to the commissioning of Heritage Impact Assessments to evaluate the impact of potential development on the OUV of World Heritage Sites. Depiction of the City Cluster is clearer but remains indicative as the City Corporation considers this to be more appropriate than an overly prescriptive boundary.
Culture Mile	City's ambition to develop Culture Mile is in line with Draft London Plan policy which encourages boroughs to identify, protect and enhance strategic clusters of cultural attractions.	Noted.

Table 3: Key strategic issues raised by the Mayor of London and outcomes

Transport for London

Table 4 below sets out the key strategic issues raised by Transport for London and any changes which have been made to City Plan 2036 or the supporting evidence base as a result.

Policy / topic	Summary of key strategic issues raised by Transport for London	Outcomes
Vehicular Transport and Servicing	Policy should state that proposals which are contrary to the safeguarding of strategic	This amendment has been included in the Proposed Submission Draft City Plan.

	infrastructure projects will be refused.	
City Cluster	<p>The draft Plan proposes a modest expansion of the City Cluster which could happen quickly as developers are acquiring sites. Very concerned about the capacity of local footways and public spaces to accommodate further growth due to existing high levels of crowding, which is likely to intensify due to the opening of the Elizabeth Line at Liverpool Street Station and completion of new tall buildings. The Corporation may face pressure to approve poor quality, overcrowded pedestrian environments around these towers. Robust traffic reduction projects should be implemented as soon as possible so that development can be delivered alongside the City’s emerging Transport Strategy, which aims to reduce traffic and gradually reallocate road space away from vehicles.</p>	<p>These concerns relating to crowding of footways and spaces in and around the City Cluster are recognised and are being addressed through the implementation of projects arising from the City’s Transport Strategy and the City Cluster Vision (both adopted in 2019). The Proposed Submission Draft City Plan places an emphasis on requiring development to contribute towards the improvement of pedestrian permeability and the quality of the public realm, and one of the policy criteria used to assess tall buildings proposals is the capacity of the City’s streets and spaces to accommodate the proposed development.</p>

Table 4: Key strategic issues raised by Transport for London and outcomes

London Borough of Tower Hamlets

Table 5 below sets out the key strategic issues raised by Tower Hamlets and any changes which have been made to City Plan 2036 or the supporting evidence base as a result.

Policy / topic	Summary of key strategic issues raised by LB of Tower Hamlets	Outcomes
Tall Buildings / Protected Views	<p>1. Need greater clarity on the evidence base for this policy. It is unclear why some areas have been deemed inappropriate for tall buildings and others have not. It seems to be inferred that areas not labelled as ‘inappropriate’ are</p>	<p>1. The Proposed Submission Draft provides more detail about how the inappropriate areas have been defined, including a new figure showing the components of areas inappropriate for tall buildings. This is supported by a</p>

	<p>therefore considered ‘appropriate’ for tall buildings, and this should be clarified.</p> <p>2. The area within the Tower of London viewing corridor should be shown as inappropriate for tall buildings, to ensure consistency with identified protected views. Other policies refer to protecting the setting of the Tower of London, but Policy S12 makes no reference to how tall buildings will be treated in relation to the setting and views of the Tower of London.</p> <p>3. The Tower Hamlets Local Plan defines tall buildings as “buildings of more than 30 metres, or those which are more than twice the prevailing height of surrounding buildings (whichever is less)”. The City’s definition should be altered to “buildings over 75m above Ordnance Datum (AOD) in height, or more than twice the prevailing height of surrounding buildings (whichever is less)” to ensure that buildings in the City more than twice the height of adjoining buildings in Tower Hamlets are treated as tall buildings in planning policy.</p>	<p>topic paper on tall buildings and protected views, and an updated tall buildings report.</p> <p>2. Reference to the LVMF Protected Vista and the White Tower Protected Silhouette of the Tower of London has been added to Policy S12. This area is now shown as inappropriate for tall buildings.</p> <p>3. No change to definition as tall buildings are a characteristic feature of parts of the City and it is appropriate to the City’s context to adopt a definition of tall buildings which may be higher than surrounding boroughs. The City is characterised by a blend of old and new buildings of varying heights, which means that many parts of the City do not have an easily identifiable prevailing height that can be used to define tall buildings. Reference has been added to the fact that tall buildings in the City may have impacts on locations within adjacent boroughs and that developers should ensure any cross-boundary impacts are fully addressed.</p>
<p>Pool of London / Aldgate, Tower and Portsoken Key Areas of Change</p>	<p>The proximity of these areas to the Tower of London should be recognised, with wording added to specify the importance of ensuring the setting of the Tower is preserved and enhanced. It should also specify the importance of</p>	<p>Wording added to the supporting text to highlight that part of both areas lie within the Local Setting Area of the Tower of London World Heritage Site (WHS) and that development proposals and public realm works should seek</p>

	ensuring that redevelopment proposals take the opportunity to enhance the wider setting of the Tower where possible.	opportunities to enhance the immediate surroundings of the WHS.
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Table 5: Key strategic issues raised by LB of Tower Hamlets and outcomes

London Borough of Hackney

Table 6 below sets out the key strategic issues raised by Tower Hamlets and any changes which have been made to City Plan 2036 or the supporting evidence base as a result.

Policy / topic	Summary of key strategic issues raised by LB of Hackney	Outcomes
Affordable workspace	Hackney supports the encouragement given to affordable office workspace and lower cost business space in Strategic Policy S4 and suggests this policy could go further in requiring a specified proportion of new floorspace as affordable to ensure this is secured in new development. Hackney's new Local Plan and draft Shoreditch AAP require 10% of gross new floorspace in major commercial developments to be affordable or low cost floorspace.	At present there is no evidence that a specific policy requirement for subsidised workspace is needed in the City, but developers are encouraged to consider a range of leasing structures, including below market rents, where appropriate. The City Corporation is working with neighbouring boroughs to ensure that affordable workspace and move-on accommodation needs can be met and reference to this has been added to the City Plan.
Culture Mile	Share the City's enthusiasm for developing the area's cultural infrastructure. Hackney is working with developers to establish a major cultural attraction at The Stage development, the Shakespearian theatre site in Shoreditch. Welcome the opportunity to integrate the Culture Mile into future plans for Shoreditch and particularly welcome further discussion on the approach to entertainment, leisure	Dialogue on cross-boundary issues relating to culture, visitors and the night-time economy has continued since the Draft Plan consultation and is addressed in the Statement of Common Ground between the City Corporation and the London Borough of Hackney.

	and night time uses to ensure a coordinated policy approach.	
Liverpool Street	Interested to be kept updated with regard to office and retail development activity around Liverpool Street Station, Broadgate and the Moorgate/Liverpool Street PSC, particularly if the City wishes to promote business intensification in this area. The retail link on Bishopsgate adjoins the Hackney border and is considered to complement the approach to retail in the draft Future Shoreditch AAP.	Dialogue on cross-boundary issues relating to retail and town centre uses, particularly in the Liverpool Street and Shoreditch areas, has continued since the Draft Plan consultation and is addressed in the Statement of Common Ground between the City Corporation and the London Borough of Hackney.

Table 6: Key strategic issues raised by LB of Hackney and outcomes

London Borough of Islington

Table 7 below sets out the key strategic issues raised by Islington and any changes which have been made to City Plan 2036 or the supporting evidence base as a result.

Policy / topic	Summary of key strategic issues raised by LB of Islington	Outcomes
Tall Buildings	Islington’s preferred approach is plan-led where specific sites are identified as appropriate in principle for development of tall buildings based on urban design analysis. Recognise that the City’s context, in particular its location and function; density of use; and built form with significant clusters of tall buildings; may collectively justify an area-based approach. Impacts could arise within Islington from tall buildings in certain areas where the draft policy would allow tall building in principle near the borough boundary. Seek explicit policy reference that tall buildings may have cross boundary impacts on	The Proposed Submission Draft carries forward the same policy approach to tall buildings but provides more detail about how the inappropriate areas have been defined, including a new figure showing the components of areas inappropriate for tall buildings. This is supported by a topic paper on tall buildings and protected views, and an updated tall buildings report. Reference has been added to the fact that tall buildings in the City may have impacts on locations within adjacent boroughs and that developers should ensure any cross-boundary impacts are fully addressed

	locations in Islington and that these impacts must be considered when deciding applications.	
Affordable workspace	Support the aim to encourage provision of office workspace for small and growing businesses. Islington operates an affordable workspace policy and has experience in the delivery and management of such space. If space for small and growing businesses is unable to be accommodated on-site in City developments, would welcome discussions on whether the policy could secure off-site contributions towards affordable workspaces in Islington or whether actual physical space could be directly provided on Islington sites where opportunities arise.	At present there is no evidence that a specific policy requirement for subsidised workspace is needed in the City, and hence there is no mechanism to require off-site contributions where provision isn't made on-site. However, the City Corporation is working with neighbouring boroughs to ensure that affordable workspace and move-on accommodation needs can be met and reference to this has been added to the City Plan.
Culture Mile	Suggest a requirement to mitigate/prevent cross-boundary effects as part of relevant cultural/night-time economy proposals be referenced in the City Plan. Islington has designated the Clerkenwell / Farringdon Cultural Quarter and proposes introducing a new local shopping area along Cowcross Street, both of which could complement Culture Mile. Note that Culture Mile may create more demand for visitor accommodation. Islington has limited capacity for new hotels beyond those in the development pipeline and request this issue is carefully considered to ensure need/demand for visitor accommodation can be accommodated within the City.	Text has been added to the City Plan to recognise these complementary initiatives in Islington, while also highlighting the potential for cross-boundary impacts from cultural and night-time economy uses and requiring these to be mitigated. The vast majority of visitors to the Culture Mile are expected to be day visitors given the excellent accessibility by public transport, but the City Plan in general, and the Culture Mile Implementation policy in particular, take a relatively supportive policy approach towards additional hotel provision in appropriate locations.

Table 7: Key strategic issues raised by LB of Islington and outcomes

Surrey County Council

Surrey County Council noted that the draft Plan stated that a minerals policy is not required, and commented that a minerals policy which encourages the recycling of construction and demolition waste on site and the use of recycled aggregate would demonstrate good practice while also reducing the need for imported land-won aggregates, especially considering the amount of development proposed in the Plan.

The City Corporation does not consider that a minerals policy is necessary or appropriate given that the London Plan does not provide an apportionment to the City of London for land-won aggregates. However, additional text has been added to the City Plan to highlight that the application of circular economy principles encourages the re-use and recycling of demolition waste and the use of recycled aggregates in order to reduce reliance on imported aggregates and retain embodied carbon.

Historic England

Table 8 below sets out the key strategic issues raised by Historic England and any changes which have been made to City Plan 2036 or the supporting evidence base as a result.

Policy / topic	Summary of key strategic issues raised by Historic England	Outcomes
Tall Buildings	1. While the objective behind the policy is welcome, by specifying certain areas as inappropriate for tall buildings within the policy there is an inference that sites not within these areas will be considered 'appropriate' for tall buildings. This would appear to include areas in the backdrop to the river prospect from LVMF viewing location 10A (Tower Bridge) and potentially locations 25A (1-3). This conflicts with the policy on protected views. Clarification would help reinforce overall objectives relating to the setting of the World Heritage Site (WHS).	1. While the overall policy approach in the Proposed Submission Draft City Plan is broadly similar, additional clarification has been provided in the policy, text and supporting diagrams. This includes reference to the LVMF Protected Vista and the White Tower Protected Silhouette of the Tower of London in the tall buildings policy and clarification that this area is inappropriate for tall buildings. 2. Various textual amendments have been made to the text of the tall buildings and protected views policies to refer to the

	2. Text downplays potential significant impacts on the setting of the WHS and its Outstanding Universal Value. Suggest cross-referencing Policy HE3 and other textual amendments.	setting of the WHS and in particular the White Tower Protected Silhouette.
City Cluster	Would welcome precise detail on the revised boundaries. While the reference to heritage assets within the cluster is welcome, the lack of reference to the potential impact of tall buildings on the Tower and its setting gives cause for concern. Policy should offer clearer parameters as to what would be acceptable in terms of tall buildings. Further detail on the overall massing and building heights envisaged within the cluster would remove the existing ambiguity. We would be keen to understand the process involved in 3D modelling, how this sits with the evidence base and will be used to shape further detailed design guidance.	Depiction of the City Cluster in the Proposed Submission Draft City Plan is clearer but remains indicative as the City Corporation considers this to be more appropriate than an overly prescriptive boundary. Further details on development parameters will be set out in a forthcoming review of the Protected Views SPD. There are practical difficulties with making the 3D modelling publicly available as part of the Plan evidence base but discussions have been continuing with Historic England regarding the use and future development of the City's 3D modelling work..
Evidence base	Note lack of up-to-date evidence in relation to historic environment and consider that emerging policies designed to guide the form of development in the Key Areas of Change should be more closely aligned to relevant evidence.	Additional evidence has been prepared to support the Proposed Submission Draft City Plan, including reports on each Key Area of Change which take account of their character and historic context.

Table 8: Key strategic issues raised by Historic England and outcomes

Environment Agency

Table 9 below sets out the key strategic issues raised by the Environment Agency and any changes which have been made to City Plan 2036 or the supporting evidence base as a result.

Policy / topic	Summary of key strategic issues raised by the Environment Agency	Outcomes
Sleeping accommodation below Thames breach level	Recommend inclusion of the imminent requirement for all sleeping accommodation to be located above the modelled tidal breach level, unless it can be demonstrated that a permanent fixed barrier at the threshold of the property prevents water ingress in a breach event.	Wording to this effect has been added to the Proposed Submission Draft of the City Plan.
Tidal defences	A key requirement of the TE2100 Plan for the City, in addition to future flood defence raising, is the need for a 16m wide corridor of land along the existing defences to be safeguarded. Would like to see a specific requirement for development to include an adequate set back from the defences to allow access for future maintenance and raising in line with the TE2100 Plan.	A requirement to incorporate adequate set back from the defences to allow for future maintenance and raising has been added to the Plan, although the specific requirement for a 16m wide corridor has not been included as this would not be feasible on many City sites.
River enhancement	While this may not be applicable to all riverside development, it should be an expectation of the City Plan that habitat creation is considered for all riverside proposals. Where significant opportunities for habitat creation exist, it should then be a further expectation that development proposals should include reasonable habitat enhancement and creation provisions.	An additional criterion has been added to Strategic Policy S17: Thames Policy Area to ensure that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats.

Table 9: Key strategic issues raised by the Environment Agency and outcomes

Natural England

Natural England responded to the Draft Plan consultation but did not raise any substantive issues.

Highways England

Highways England responded to the Draft Plan consultation but did not raise any substantive issues.

Marine Management Organisation

The Marine Management Organisation responded to the Draft Plan consultation and raised a specific point about the wording of the supporting text which has been addressed in the Proposed Submission version of the City Plan.

Ongoing engagement

Since the consultation on the Draft City Plan 2036 concluded in 2019, engagement has continued with not only the duty to cooperate bodies listed above but also with neighbouring boroughs and other key stakeholders that did not raise any particular issues or concerns regarding the emerging City Plan.

For example, this has included active engagement with Waste Planning Authorities inside and outside London to ensure that the City can meet its London Plan waste apportionment and that capacity remains available for the City waste exports during the Plan period, in the context of a policy approach that strongly promotes circular economy principles and waste reduction.

Appendix 1 lists specific meetings and discussions that have taken place with DtC bodies in addition to regular liaison through forums such as ALBPO and member-level engagement through London Councils and other partnership groups. The frequency of meetings has declined slightly in the last year due to the Covid-19 pandemic with more matters being dealt with by email and phone.

Statements of Common Ground

Paragraph 27 of the NPPF states that strategic policy making authorities should prepare statements of common ground in order to demonstrate effective and on-going joint working, documenting the cross-boundary matters being addressed and progress in cooperating to address these. It also states that these should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process.

The City Corporation has to date agreed Statements of Common Ground with:

- London Borough of Islington
- City of Westminster
- London Borough of Lambeth
- London Borough of Southwark
- London Borough of Camden
- London Borough of Tower Hamlets

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- London Borough of Hackney
- Surrey County Council – strategic waste matters
- Essex County Council – strategic waste matters
- London Borough of Bexley- strategic waste matters
- London Borough of Brent – strategic waste matters
- London Borough of Havering -strategic waste matters
- London Borough of Merton – strategic waste matters

These Statements of Common Ground will be published as part of the consultation on the Proposed Submission Draft City Plan 2036. Further Statements of Common Ground may be agreed prior to submission of the City Plan 2036 for examination.

Section Four: Conclusion

Throughout the plan making process the City Corporation has engaged actively with its stakeholders, prescribed bodies and partners and discussed with them all strategic cross- boundary issues. The City Plan 2036 published under Regulation 19 (Town and Country Planning Act (Local Planning) (England) Regulations 2012) reflects the views and comments received during the plan making process of engagement and joint working.

This Statement, the Consultation Statement, and the Statements of Common Ground will demonstrate how the City Corporation has complied with its duty to cooperate and will be used during the Examination in Public.

As the Duty to Cooperate is an ongoing process this Statement will be updated prior to submission of the City Plan 2036 for examination.

Appendix 1 - Meetings with Duty to Cooperate bodies since January 2015

Table A1 below excludes regular ALBPO meetings and Member-level engagement activities.

Date	Attendees	Purpose of meeting
27/01/2015	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
13/04/2015	Drain London (comprises all London boroughs & the City, GLA, TfL, London Councils, Environment Agency, Thames Water)	Partnership working group on mitigating the risk of surface water flooding and increasing the use of sustainable drainage
14/04/2015	City of London LB Hackney LB Tower Hamlets	Liaison meeting to update on Local Plan progress and related policy issues
15/05/2015	GLA CAZ London boroughs & the City	Workshop on CAZ mixed use development and small offices research
23/04/2015	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
29/04/2015	City of London LB Camden LB Islington	Liaison meeting to update on Local Plan progress and related policy issues
08/05/2015	City of London Westminster City Council	Liaison meeting to update on Local Plan progress and related policy issues
02/06/2015	City of London Historic England	Liaison meeting to update on Local Plan progress and related policy issues
10/06/2015	City of London Environment Agency	Liaison meeting to update on Local Plan progress and related policy issues

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15/07/2015	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
11/08/2015	City of London Historic England	Liaison meeting to update on Local Plan progress and related policy issues
11/09/2015	Invited stakeholders North London Waste Plan Consultation Event	Attended consultation event regarding the North London Waste Plan
15/09/2015	City of London LB Lambeth LB Southwark	Liaison meeting to update on Local Plan progress and related policy issues
13/10/2015	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
16/10/2015	South East London Joint Waste Planning Group (comprises Bexley, Bromley, City, Greenwich, Lewisham, Southwark)	Partnership working group to agree pooled arrangements for meeting the London Plan waste apportionment
19/10/2015	City of London LB Camden LB Islington	Telephone call with consultants (ORS) carrying out joint SHMA for the two boroughs.
26/01/2016	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste strategy
05/02/2016	South East London Joint Waste Planning Group (Bexley, Bromley, City, Greenwich, Lewisham, Southwark)	Partnership working group to agree pooled arrangements for meeting the London Plan waste apportionment
08/02/2016	City of London LB Hackney LB Tower Hamlets	Liaison meeting to update on Local Plan progress and related policy issues

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08/02/2016	City of London LB Southwark LB Lambeth RB Kensington & Chelsea Port of London Authority Environment Agency GLA	Thames Strategies discussion
15/02/2016	Central London North Flood Risk Partnership Group (comprises Camden, City, Hammersmith & Fulham, Islington, Kensington & Chelsea, Westminster, Environment Agency)	Partnership working group on mitigating the risk of flooding
14/03/2016	Drain London (comprises all London boroughs and the City, GLA, Environment Agency, Thames Water)	Partnership working group on mitigating the risk of surface water flooding and increasing the use of sustainable drainage
15/03/2016	City of London LB Camden LB Islington	Liaison meeting to update on Local Plan progress and related policy issues
14/04/2016	City of London GLA	Meeting about City Local Plan review
19/04/2016	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
21/04/2016	City of London Historic England	Liaison meeting to update on Local Plan progress and related policy issues
11/05/2016	Invited stakeholders	Attended stakeholder event regarding LB Tower Hamlets Transport Strategy
13/05/2016	South East London Joint Waste Planning Group (Bexley, Bromley, City, Greenwich, Lewisham, Southwark)	Partnership working group to agree pooled arrangements for meeting the London Plan waste apportionment

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18/05/2016	City of London Environment Agency	Liaison meeting to update on Local Plan progress and related policy issues
18/05/2016	City of London LB Tower Hamlets LB Hackney LB Islington	Tall buildings policy discussion
19/05/2016	City of London LB Camden Westminster City Council	Liaison meeting to update on Local Plan progress and related policy issues
19/07/2016	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
05/08/2016	London Aggregates Working Party (comprises GLA, London boroughs, regional bodies, DCLG, PLA, industry reps)	Partnership working group on issues relating to sand and gravel extraction and aggregate supply infrastructure
15/09/2016	Drain London (comprises all London boroughs and the City, GLA, Environment Agency (London LLFA, Thames Water)	Drain London Partnership working group on mitigating the risk of surface water flooding and increasing the use of sustainable drainage
17/10/2016	GLA London boroughs and City	Meeting regarding Zero Carbon Homes and London Plan energy policies
18/10/2016	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
09/11/2016	Central London North Flood Risk Partnership Group (comprises Camden, City, Hammersmith & Fulham, Islington, Kensington & Chelsea, Westminster, Environment Agency)	Partnership working group on mitigating the risk of flooding

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23/11/2016	City of London Environment Agency	Liaison meeting to discuss the EA's response to the Local Plan review Issues and Options consultation
07/12/2016	City of London LB Islington	Liaison meeting to update on Local Plan progress and related policy issues, specifically hotels
14/12/2016	City of London LB Hackney	Liaison meeting to update on Local Plan progress and related policy issues
04/01/2017	City of London TfL	Meeting to discuss TfL's response to the Local Plan Issues and Options consultation
12/01/2017	City of London GLA	Meeting to GLA's response to the Local Plan Issues and Options consultation and the London Plan
25/01/2017	London Waste Planning Forum (comprises London waste planning authorities, regional bodies, GLA, Environment Agency)	Partnership working group for the exchange of information and good practice relating to the planning of waste
13/02/2017	GLA London Boroughs	Energy Policy Meetings Discussed implementation of zero carbon policy
01/03/2017	City of London TfL Taxis and Private Hire	Meeting to discuss TfL Taxi and Private Hire's response to the Local Plan Issues and Options consultation
07/03/2017	Marine management Organisation Various Stakeholders	Marine Planning south east plan development consultation workshop
28/03/2017	Central London North Flood Risk Partnership Meeting	Preliminary Flood Risk Assessment update, identification, and management of Flood Risk Areas. LLFA role
29/03/2017	Drain London and LoDEG Partnership Meeting	Partnership working group on mitigating the risk of surface water flooding and increasing the use of sustainable drainage.

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26/04/2017	Environment Agency, GLA, London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum meeting. Discussed waste apportionment. Consultants recommendations to GLA, update on methodology.
26/06/2017	Marine Management Organisation	Marine Management Organisation liaison meeting
27/06/2017	London Aggregates Working Party (Aggregates Industry Reps, GLA and London Boroughs)	London Aggregate Monitoring Report 2016 status and how the gaps that will be addressed in due course.
30/06/2017	Westminster CC LB Camden, RB Kensington and Chelsea	Discussion on waste apportionments and how to be more proactive regarding waste from tower blocks
14/07/2017	LB Islington	Liaison meeting to update on Local Plan progress and related policy issues.
14/07/2017	Environment Agency, GLA, London Boroughs, London Fire Brigade, Thames Water	Drain London/ LoDEG Partnership meeting
18/07/2017	Environment Agency, GLA, London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum Discussed general waste issues relevant to members
19/07/2017	Tower Hamlets	Local Plan progress and policy related issues
02/08/2017	Historic England	City's Local Plan and Historic Environment Strategy and related policy issues
15/09/2017	LB Lambeth, LB Southwark, LB Tower Hamlets,	Local Plan progress and related policy matters
20/09/2017	LB Hackney	Local Plan progress and related policy matters
17/10/2017	LB Southwark	Emerging Southwark Local Plan and related policy matters
31/01/2018	Natural England	City's Habitats Regulations Assessment
02/05/2018	LB Islington	Local Plan progress and related policy issues

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16/05/2018	LB Wandsworth, RB Kensington and Chelsea and Westminster CC	Local Plan progress and related policy issues
15/11/2018	LB Camden	Local Plan progress and related policy issues
05/12/2018	LB Lambeth	Local Plan progress and related policy issues
11/12/2018	Westminster CC	Local Plan progress and related policy issues
09/01/2019	LB Islington	Local Plan progress and related policy issues
04/02/2019	LB Hackney	Local Plan progress, the Shoreditch Area Action Plan and related policy issues
08/02/2019	LB Hackney	Draft City Local Plan progress and related policy issues
28/03/2019	Environment Agency, GLA, London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum Discussed general waste issues relevant to members
24/04/2019	CAA	Discussion of changes to CAA Building Height Limitation across the City of London
01/05/2019	LB Islington	Planning for culture and affordable workspaces
15/05/2019	Environment Agency	Riverside Strategy for tidal defences raising
10/06/2019	Central London North Flood Risk Partnership Group (comprises Camden, City, Hammersmith & Fulham, Islington, Kensington & Chelsea, Westminster, Environment Agency)	Partnership working group on mitigating the risk of flooding
17/06/2019	South East London Joint Waste Planning Group -LB Bexley, LB Bromley, LB Greenwich, LB Lewisham, LB Southwark	Joint waste planning for the management of the Group's London Plan waste apportionments.
28/06/2019	GLA	GLA's representation on the City's Draft City Plan 2036 and related policy issues on housing

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		and office development and tall buildings/protected views.
10/07/2019	Environment Agency GLA London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum. Discussed general waste issues relevant to members
17/07/2019	Aggregates industry reps GLA London Boroughs PLA	London Aggregates Working Party
08/10/2019	LB Southwark	Discussion by phone on Local Plan progress and Statement of Common Ground
10/10/2019	GLA	Meeting re. heat networks
15/10/2019	Environment Agency GLA London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum Discussed general waste issues relevant to members
30/10/2019	LB Lambeth	Local Plan progress and related issues including Statement of Common Ground
13/11/2019	LoDEG Partnership meeting	Partnership working group on mitigating the risk of surface water flooding and increasing the use of sustainable drainage
14/11/2019	LB Tower Hamlets	Local Plan progress and related policy issues
28/11/2019	Environment Agency, PLA, Marine Management Organisation, GLA, LB Southwark, LB Islington, LB Tower Hamlets	Riverside Strategy meeting to introduce the project to various key stakeholders
28/11/2019	Aggregates industry reps GLA London Boroughs PLA	London Aggregates Working Party
10/12/2019	City and Hackney Clinical Commissioning Group	Discussion on health issues relating to the City Plan 2036 and future liaison
29/01/2020	Environment Agency GLA London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum Discussed general waste issues relevant to members
30/01/2020	South East London Joint Waste Planning Group	Discussed progress on the Waste Technical Report
31/01/2020	GLA and London boroughs	Workshop on energy assessments

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12/02/2020	GLA	Progress on the City Plan 2036 and related policy issues
17/02/2020	Environment Agency	Riverside Strategy meeting
26/02/2020	GLA, London boroughs	Climate emergency workshop
12/03/2020	Environment Agency, 12 riparian London boroughs	Local Councils Partnership Meeting – managing tidal flood risk
03/06/2020	LoDEG Partnership meeting	Partnership working group on mitigating the risk of surface water flooding and increasing the use of sustainable drainage
23/06/2020	LB Camden	Local Plan progress and related issues including Statement of Common Ground
14/07/2020	Environment Agency GLA London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum. Discussed general waste issues relevant to members. Presentation about CIRCUIT project, which helps cities adapt to circular economy principles
18/09/2020	LB Hackney	Local Plan progress and related issues including Statement of Common Ground
30/09/2020 & 23/11/2020	Historic England	Meetings to discuss scope of Historic England commissioned work on the further analysis of the historic significance of the City of London
05/10/2020	South East London Joint Waste Planning Group -LB Bexley, LB Bromley, LB Greenwich, LB Lewisham, LB Southwark	Joint waste planning for the management of the Group's London Plan waste apportionments.
13/10/2020	Central London North Flood Risk Partnership Group (comprises Camden, City, Hammersmith & Fulham, Islington, Kensington & Chelsea, Westminster, Environment Agency)	Partnership working group on mitigating the risk of flooding

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14/10/2020	Environment Agency GLA London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum Discussed general waste issues relevant to members
03/11/2020	Environment Agency, riparian boroughs	Thames Estuary 2100 Plan Council Workshp
07/01/2021	Environment Agency GLA London Boroughs SE and E of England Waste Plan reps	London Waste Planning Forum Discussed general waste issues relevant to members
23/02/2021	LB Hackney, LB Islington, London First	Discussion about commercial and residential planning and development issues during the Covid-19 pandemic