

**Statement of Common Ground (SoCG) between
City of London Corporation and Barbican and Golden Lane Neighbourhood Forum**

25 November 2024

Whole Plan

Purpose of the Statement of Common Ground

- 1.1. The purpose of this SoCG is to update the local plan Inspector/s and other parties in relation to matters raised within Regulation 20 representations. The topics covered in this SoCG are open spaces and green infrastructure, housing and heating and cooling.
- 1.2. This SoCG has been prepared post submission of the City Plan 2040 on 29 August 2024. It highlights matters where agreement has been reached, and areas where agreement has not yet been reached but will be subject to further discussion at the local plan examination hearings.
- 1.3. This SoCG is in addition to any other matters statements to be produced during the course of the examination by either party.

2. Parties

- 2.1. The signatories to this SoCG are the City of London Corporation (City Corporation) and the Barbican and Golden Lane Neighbourhood Forum.

3. Comments received at Regulation 20

- 3.1. The Barbican and Golden Lane Neighbourhood Forum (R0218) submitted their response to the Regulation 19 City Plan on 17 June 2024.
- 3.2. The strategic topics covered in this SoCG are open spaces and green infrastructure, housing and climate resilience including heating and cooling. The Smithfield and Barbican Key Area of Change, its boundary and policies, is also covered. The Neighbourhood Forum would like their role and status in the City Plan to be acknowledged and recognised. It is acknowledged this does not exhaustively cover all of the issues covered by the Forum's response.
- 3.3. Below includes the relevant reference to a number of the comments to which this SoCG relates, both parties agree this is a true record of the main matters subject to this SoCG. There are comments on other topics which are not included in this SoCG as they are more minor matters. Other suggestions as put forward by the Barbican and Golden Lane Neighbourhood Forum are proposed but not included below.

3.3.1. Importance of NF and inclusion/reference in plan

- The Neighbourhood Forum and Area should be referred to throughout the Plan, including with a new Strategic Policy (*R0218/C0002, R0218/C0047, R0218/C0048*)

3.3.2. Heritage and Tall Buildings

- The Barbican and Golden Lane area is 'very sensitive' to tall buildings, and the Smithfield & Barbican KAOC to be inappropriate for new tall buildings (*R0218/C0021*)

3.3.3. Culture

- Strengthen the culture policies, undertake engagement and provide clarity on how visitor facilities and cultural contributors are related (*R0218/C0140, R0218/C0147*)

3.3.4. Housing

- *R0218/C0061* Revision to S3 and S23 to identify housing site allocations to ensure that local needs for housing are met.
- Delivery of housing locally through identification of site allocations and developer contributions (*R0218/C0061, R0218/C0137*)
- Protecting housing standards and residential amenity of permanent residential accommodation (*R0218/C0136, R0218/C0138*)

3.3.5. Greenspaces and urban heat island effect

- Protection of open space (*R0218/C0036, R0218/C0128*)
- Strengthening policy requirements and providing further detail to support BNG and UGF (*R0218/C0031, R0218/C0032, R0218/C0038*)
- Commentary in the Plan on reducing the urban heat island effect and providing for future infrastructure requirements, including connecting to additional substations (*R0218/C0180, R0218/C0153, R0218/C0154, R0218/C0157*)

4. Matters on which parties agree

- 4.1. Both parties agree on the ambitions of City Plan 2040 to make the City a more sustainable place, improve culture and amenity for people who live and work here, provide inclusive buildings and spaces, and enhance environmental quality.
- 4.2. Both parties agree that both Smithfield and Barbican are identified as Key Areas of Change for reasons such as the anticipated moves of the Museum of London and Smithfield Market
- 4.3. Both parties agree on the City Plan focussing additional housing in and around the identified residential areas. It is also agreed that the loss of conventional residential to other residential uses such as student or co-living should be resisted.
- 4.4. Both parties agree that the Barbican and Golden Lane areas are 'very sensitive' to tall buildings as identified in the Tall Buildings Topic Paper. Both parties also acknowledge the existence of tall buildings within the area.
- 4.5. Both parties agree on the policy intention to emphasise green corridors for biodiversity enhancement.

4.6. Both parties agree on the importance of climate resilience and retrofit approaches.

5. Agreed proposed changes

5.1. Table 2 below sets out the proposed changes which the City Corporation is putting forward to the examination which result from the matters as above (and other representations in some cases).

Table 1 Proposed changes

Paragraph	Proposed change
Figure 31	Error in correction in location of open space on Moor Lane.
Figure 1	Amendments to Figure 1 Key Diagram as follows: Green <u>Corridors Links</u> . Change proposed.
Paragraph 4.4.0	The net loss of existing housing units, <u>including to other residential products such as student or co-living</u> , will be resisted because of the limited opportunities to replace it in the City.
CV1	CV1 (Title) Protection of Existing <u>Cultural Infrastructure, and Leisure, Recreation and Visitor Arts and Cultural Facilities</u> . CV1 (1).... loss of existing <u>cultural infrastructure, and leisure, recreation and visitor visitor, arts, and cultural facilities</u> CV1 (2).... Proposals resulting in the loss of <u>cultural infrastructure, and leisure, recreation and visitor arts and cultural facilities</u>Loss of facilities will only be permitted where this would facilitate the overall enhancement of <u>cultural, leisure, recreation or visitor, arts or cultural provision</u>an alternative <u>cultural, leisure, recreation or visitor, arts or cultural use</u> at reasonable terms for such a use.... 7.2.0....accommodate these uses. <u>In a cultural ecosystem approach, these arts and cultural organisations and facilities are also known as sites of cultural production and/or cultural consumption</u> 7.2.2....applicants will be required to demonstrate that an existing <u>cultural infrastructure, and leisure, recreation and visitor, arts or cultural facilities</u> has been marketed....
S6	S6 ...enhance the City of London's cultural <u>infrastructure</u> ... S6 (2)a wide range of <u>cultural infrastructure, and leisure, and recreation and visitor</u> ... S6 (3)...areas of <u>cultural infrastructure significance</u> including cultural buildings and leisure, and recreation and visitor facilities ... S6 (5)...seeking opportunities to embed heritage in the <u>cultural infrastructure offer</u> ... S6 (7)... supports the <u>City's cultural infrastructure or businesses primary business or cultural role of the City</u> ... S6 (8)... especially in areas of night-time activity and around <u>cultural infrastructure, including and tourist</u> ... S6 (9)...Maintaining the City's <u>cultural infrastructure, including existing artworks</u> ... 7.1.0....in the streets and informal spaces in between <u>and to recognise this the plan takes forward a 'Cultural Ecosystem' approach deployed in the Cultural Planning Framework</u> . <u>The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Within the Cultural Ecosystem, cultural infrastructure makes up the primary sites where culture is either produced or consumed: this includes production in creative education, workspaces, studios and</u>

	<p><u>livery halls; and consumption in museums, art galleries, cinemas, livery halls, libraries, theatres, and performance venues. These include buildings, structures and spaces where culture is either consumed (culture consumption spaces) or produced (culture production spaces) such as creative workspaces, arts galleries, studios, museums, theatres, Livery Halls, libraries, music, sports, entertainment and performance venues; and complementary uses which contribute to the primary culture, leisure and recreation function such as restaurants, retail, hotels, open spaces and tourism facilities. Cultural contributors are complimentary uses that facilitate cultural infrastructure, these can include restaurants, bars, clubs, public houses, retail areas and tourism facilities.....</u></p> <p><u>7.1.4...and changes of use to protect existing cultural infrastructure, and leisure, recreation and visitor, arts and cultural facilities....</u></p>
Glossary	<p>Page 307- Neighbourhood Forum- <u>a group which has been designated under the neighbourhood planning process for a specific designated neighbourhood area. A neighbourhood forum has the ability to prepare a Neighbourhood Plan. It is a statutory consultee on planning applications and depending on the status of the Neighbourhood Plan, will be consulted on the allocation of a proportion of Neighbourhood CIL receipts for applications permitted within its area.</u></p> <p><u>14.8.2 The Neighbourhood Area and Neighbourhood Forum for the Barbican and Golden Lane area were designated by the City Corporation on 18 July 2023. The Forum is in the process of preparing a Neighbourhood Plan for the designated neighbourhood area.</u></p>

6. Matters on which parties disagree

Table 3 below sets out matters which have not yet been agreed by the two parties.

Topic/matter	City of London Corporation	Neighbourhood Forum
Boundary of the Smithfield and Barbican KAOC	<p>The Neighbourhood Area boundary is identified on Policy Map B. The Neighbourhood Area and the KAOC boundary are different because they have different roles. The Neighbourhood Area was identified for the purposes of developing a Neighbourhood Plan, and was on the basis of the information provided within the application.</p> <p>The boundary of Smithfield and Barbican KAOC boundary is not aligned in other parts to the Neighbourhood Area. The City Corporation does not agree that the eastern KAOC boundary should align with the Neighbourhood Area. See Appendix 1 for comparison of policy areas.</p>	<p>In such a small, distinct area having a separate KAOC boundary creates an unnecessary inconsistency.</p> <p>To make the Plan comprehensible, the City needs to map the B&GLNF boundary <u>in the policy maps</u> given the mis-match of KAOC, B&GLNF, and Smithfield-only policy boundaries</p>
Potential for a Strategic Policy for Barbican &	A strategic policy for the Barbican and Golden Lane area to recognise the	No rationale or evidence has been provided to

<p>Golden Lane in the Smithfield & Barbican KAOC.</p>	<p>residential character is not required as residential areas are identified in Policy HS1. The Forum is currently developing a Neighbourhood Plan, the policies of which, when 'made' will sit alongside other development plan documents for the Neighbourhood Area. The content and policies of the Neighbourhood Plan will be developed by the Forum.</p>	<p>explain why a strategic policy is required for Smithfield but not for Barbican and Golden Lane. This does not engage with any of the reasoning put forward in the Forum's response.</p>
<p>Housing Delivery</p>	<p>Due to the business nature of the City of London the City Plan does not propose any residential site allocations. Therefore, a different approach is required to demonstrate delivery against the housing requirements over the plan period, in particular years 4 onwards. The Housing Explanatory note (2024) confirms the appropriateness of a windfall allowance and provides an update on housing delivery against London Plan targets to 2028/9 and beyond.</p> <p>Permanent residential accommodation, is appropriate in identified residential areas. The policy already resists the loss of permanent residential accommodation. The conversion of C3 residential to other residential formats (eg students or co-living) would be assessed in accordance with all relevant policies of the development plan.</p> <p>Residential amenity is already considered in the City Plan and the London Plan addresses the Agent of Change Principle.</p>	<p>The Forum challenges the assertion that windfall is sufficient to meet the City's housing needs. The City says that 'there is no evidence that in the longer term, the level of windfalls previously seen in the City will not continue.' An absence of evidence does not constitute proof that windfalls will continue as they did in previous plans.</p> <p>The NPPF been updated, and the London Plan has changed, so conclusions drawn in 2015 cannot be relied upon again in 2024.</p> <p>We also note that the City expects to fall short of housing targets for the first 5 years, and that the annual requirement for 146 homes to 2028/29 drops to 102 homes pa to 2039/40 partly to retain sites for office development.</p> <p>It is a surprising position on such an important topic and does not meet the requirements of national policy (NPPF para 75, 76, 77 and 78 especially).</p> <p>There is a priority for delivery of affordable housing, build to rent, sheltered and extra care housing in identified</p>

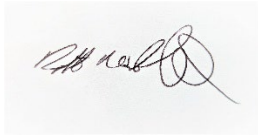
		<p>residential areas. The loss of permanent residential accommodation should be resisted. Housing is encouraged in residential areas for a retrofit first approach.</p> <p>The changing demographic of the City's resident population and their projected support needs are insufficiently recognised in the 2040 Plan.</p> <p>Evidence of damage to residential amenity in the City shows that the proposed policy is unsound and insufficient.</p>
<p>Heritage and Tall Buildings</p>	<p>The City Plan has been prepared to be in general conformity with the London Plan (2021). Policy D9 of the London Plan sets out that plans should identify locations where tall buildings could be appropriate and set height expectations in those areas. This, alongside heritage and character considerations, has been the starting point for developing the approach to tall buildings in the City Plan, and is considered to be an appropriate and justified strategy.</p>	<p>Policy CS12 from the Local Plan 2015 needs to be reinstated (to safeguard the City's listed buildings and their settings etc.).</p> <p>Policy S12 should reinstate the existing Local Plan policy that tall buildings are inappropriate in conservation areas (together with the current definition of such tall buildings as those that significantly exceed the height of their general surroundings).</p> <p>Policy HE1 should be strengthened to comply with the NPPF - opportunities to enhance conservation areas to be sought and pursued and not merely considered.</p> <p>Because the Barbican and Golden Lane area is 'very sensitive' to tall buildings,</p>

		<p>the Smithfield & Barbican KAO is inappropriate for new tall buildings. Policy S23 should say that “buildings that are significantly taller than their surrounding will be resisted”.</p> <p>The 75m+ definition of a tall building is arbitrary and inappropriate to the context of conservation areas in the City, and specifically to the conservation areas within the Barbican & Golden Lane Neighbourhood Area.</p>
Protection of open space, amenity space/views and greening	<p>The loss of open space and proposals that impact the quality of open space are already resisted. Views can only be considered if they are protected. Views are considered under conservation area guidance. Local views could be designated in the neighbourhood plan.</p> <p>The majority of existing open spaces are at ground floor level and this is set out further in Policy OS1 in paragraph 12.2.1. The existing wording will remain.</p>	<p>The extreme deficit of open space in the City, particularly at ground level, requires a stronger policy response to be effective. The built-up nature of the City means that views are particularly significant.</p> <p>The evidence of the open space deficit in the City is overwhelming. The proposed policy, by not seeking to protect open space, will inevitably lead to further deficit</p>
Approach to Biodiversity Net Gain	<p>The approach to BNG is supported by evidence within the Biodiversity Net Gain Study (2023). Further work on the implementation of this emerging policy alongside the statutory requirements is underway.</p> <p>Requiring developers to demonstrate how the site will attract and/or protect the City’s target species is covered under OS4. Paragraph 12.4.2 refers to City’s target species and it is envisaged the BNG policy would enable monitoring of these sites.</p>	<p>Further information for developers would be welcome. The evidence on what conditions target species need in order to thrive is currently missing, however.</p> <p>See above. Generic BNG, likely to be put forward by developers, will not focus on target species over the time period required to ensure real improvement.</p>
Urban Greening Factor target score	The UGF target score has been set as a realistic target score which is deliverable for the majority of major	Protection of greening on any site, and UGF should be raised to 0.6 minimum on

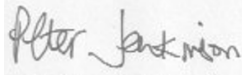
	<p>development sites and this is supported by the Mayor of London's policy and guidance. Furthermore, experience since this policy was drafted shows that most major developments in the City have met the 0.3 target. If the score cannot be met than developers would need to provide evidence to justify why it cannot be met. Please note Policy OS5 refers to trees in greater detail and paragraph 12.3.4 in Policy OS2 seeks the provision of trees.</p>	<p>major developments in the City, requiring the inclusion of “trees which are large at maturity and provide biomass, shade and amenity” and (in line with the London Plan minimum) a UGF target of at least 0.4 in the predominantly residential Barbican & Golden Lane part of the Smithfield and Barbican KAOC. There is evidence that trees and planting in new developments die due to insufficient maintenance reducing the realised UGF. The proposed policies to “promote greening” and to adopt the lowest UGF possible are already ineffective and unsound.</p>
<p>Urban heat island effects</p>	<p>Urban Heat Island Effect is considered within S15 and CR1. Point 17 includes policies on publicly available open spaces.</p> <p>Policy DE1-8.g. is framed to focus on the objectives of the LEAP and allows flexibility for future opportunities/innovations for waste heat transfer.</p> <p>This is covered in the Local Area Energy Plan.</p>	<p>There is strong evidence that UHI is a significant problem in the City, directly caused by development. Plan policies which only focus on the comfort of people inside buildings and not on the environment are unsound and ineffective.</p> <p>The LEAP is not a planning document and its “objectives” are for the local authority, not developers. A simple change to planning policy to require new schemes to future-proof their heating/cooling, especially as the City is a net exporter of heat, would make the policy more effective. This is particularly so in the case of data centres.</p> <p>So it is worth drawing attention to it in the Local Plan.</p>

Signed for the City of London:

Rob McNicol, Assistant Director (Policy & Strategy)



Signed for Barbican and Golden Lane Neighbourhood Forum



Appendix 1 – Neighbourhood Area, KAOC boundary and other spatial policy areas

