

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

March 2024



Introduction

1. This document is the Statement of Common Ground (SoCG) between the London Borough of Hackney and the City of London Corporation.
2. This SoCG applies to the preparation of the City of London Local Plan (known as City Plan 2040) and to the implementation of the London Borough of Hackney Local Plan 2033 (known as LP33). It sets out details of the cooperation between Hackney and the City of London during plan preparation and will inform further engagement to ensure effective coordination and implementation of Local Plan policies.
3. LP33 was adopted on the 22nd July 2020. It replaces Hackney's Core Strategy, Development Management Local Plan, and some of the allocations within the Site Allocations Local Plan, as well as the Area Action Plans (AAPs) for Dalston, Hackney Central and Manor House . Site allocations for the Shoreditch and Stamford Hill areas of Hackney will be identified through the forthcoming AAPs for those areas.
4. The City of London Local Plan was adopted in January 2015. The City Plan 2040 has been in development for a number of years and has undergone extensive public engagement over this time:
 - 2016 – an issues and options consultation took place (the 'regulation 18' consultation)
 - 2018 – consultation on a draft local plan
 - 2021 – the first proposed submission version of the City Plan 2036 was published and consulted on (regulation 19 stage)
5. The City Corporation has produced further evidence work and revised the City Plan in light of the issues raised during the pre-submission consultation. These issues were primarily related to:
 - Tall buildings and their impacts on heritage, including an issue of 'non-conformity' with the London Plan
 - Sustainability, in particular the approaches to embodied carbon and demolition
 - The need for more recent evidence on office and retail demand, given shifting working patterns and changes to shopping behaviours following covid-19
 - How inclusive approaches can be woven into more aspects of the City Plan, especially as the City aims to widen its appeal to visitors
6. During the summer of 2023, further informal public engagement was undertaken, providing everyone with an opportunity to shape future development in the Square Mile and to inform the City Plan.
7. In response to the previous engagement rounds and updated evidence, substantial revisions have been made to the City Plan. The City Corporation will undertake Regulation 19/20 consultation on the Revised Proposed Submission of the draft City Plan 2040 in April/May 2024.

Geography covered by the Statement of Common Ground

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



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

London Borough of Hackney

9. Hackney is a diverse inner London Borough with a population of approximately 259,000. The southern part of the Borough, which lies partly within the Central Activities Zone (CAZ) and the City Fringe/Tech City Opportunity Area, is characterised by a high-density built environment with a complex mix of uses. The central part of the Borough contains several town centres, historic Georgian and Victorian areas, large and popular open spaces and parks, social housing estates of varying periods, and employment uses. The north and north-east of the Borough are predominantly residential and of a lower density. The River Lea is a major influence on the character of the eastern edge of the Borough with the area around Hackney Wick being covered by the London Legacy Development Corporation (LLDC) as the Local Planning Authority until December 2024.

City of London

10. The City of London covers just over one square mile and is located strategically within the central area of London sharing its boundaries with the adjoining London Boroughs of Islington, Hackney, Tower Hamlets, Southwark, Westminster, Camden, and Lambeth. The City of London is a place with distinct character and special significance. It has a rich and long history being home to some of the most iconic architecture both historic and modern – from medieval architecture and churches including Wren’s iconic St Paul’s Cathedral, Livery Halls, majestic Victorian and post-war buildings to the most striking modern architecture which includes The Gherkin, The Cheesegrater and many more prominent tall buildings on the City’s skyline. The City’s character is hence layered and reflected in its buildings and spaces and its 800-year role as a major international financial centre located at the heart of CAZ. It is home to around 21,000 businesses and its resident population of about 8,600 people is significantly smaller than its working population of approximately 615,000. The City is estimated to have attracted 21.5 million leisure and business visits in 2019 and continues to be the world-leading leisure and cultural destination for workers, visitors and residents.

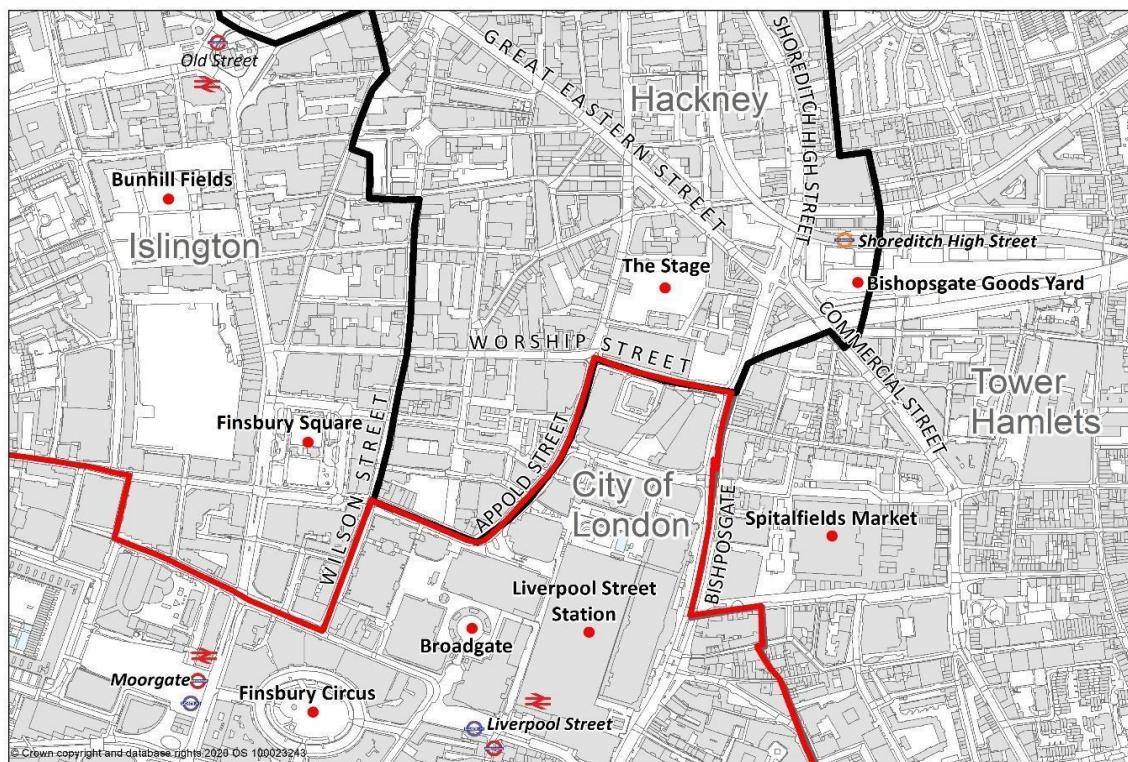


Figure 2: Boundary between London Borough of Hackney and the City of London

11. The City of London Corporation shares boundary with the London Borough of Hackney to the north. The Liverpool Street Station Key Area of Change is located in the north-eastern part of the City, on the west side of Bishopsgate, serving as a major route connecting to the London Borough of Hackney.

Key Strategic matters

12. Many of the strategic matters and key issues to be addressed through compliance with the duty to cooperate are, in London, a matter for the London Plan or are otherwise addressed through the preparation of the London Plan. The London Plan (2021) is part of the development plan for planning authorities in London and Local Plans are required to be in general conformity with it.
13. Officers from both authorities have an ongoing and close relationship with Greater London Authority (GLA) officers, attend regular meetings to discuss strategic matters affecting their areas and London and have participated in the development and review of the London Plan.
14. The City of London Corporation and the London Borough of Hackney have had a constructive dialogue on cross boundary planning matters for many years, discussing a broad range of planning issues including strategic matters. Specific meetings have been held on 14 April 2015, 8 February 2016, 18 May 2016, 14 December 2016, 20 September 2017, 4 February 2019 and 18 September 2020, 7 June 2023, 10 November 2023 (Appendix 1), which have informed development of local plans and other related documents including the Shoreditch Area Action Plan. Liaison has also been conducted through pan-London groups such as London Councils and the Association of London Borough Planning Officers (ALBPO).
15. The following issues are the key strategic matters which have been identified through specific discussions with regard to ongoing plan making, although it is noted that there could be other issues that may have cross boundary impacts. Hackney and the City of London Corporation are committed to further dialogue moving forward, and not just those limited to periods of plan preparation.

Housing

16. London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The Mayor of London has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified the need for 66,000 additional homes per year. The NPPF sets out a standardised approach to assessing housing needs and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The Local Plans are required to be in general conformity with the London Plan, which sets a housing target for all the London boroughs.
17. The City Corporation's target is 146 additional residential units per annum up to 2028/29. The target for the plan period is 1,706 units. The London Borough of Hackney sets out to deliver, as a minimum, and then seeks to exceed, its London Plan target of 1,328 per annum to 2033. LP33 seeks to deliver 26,250 over the lifetime of the plan (15 years).
18. The authorities agree that their housing target can be met within their respective boundaries. and represents a reasonable assessment of housing capacity which they are planning to meet through their adopted and emerging Local Plans.

Offices

19. The City of London and the southern portion of the London Borough of Hackney lie within the CAZ, where the London Plan promotes further economic and employment growth. The continued success of the Central Activities Zone (CAZ) is vital to London's world city status. Both authorities have introduced Article 4 Directions to protect their strategically important office supply against conversion to residential use under permitted development rights. These Article 4 Directions apply to the whole of the City of London and to an area of Hackney that covers Shoreditch, and much of Hoxton, Dalston and Hackney Central, as well as priority employment areas and town centres elsewhere in the Borough. Hackney and the City Corporation will seek to work together on these to protect the function and future growth of the CAZ in light of recent and proposed changes to the planning system, such as the proposed new permitted development rights for conversion from Use Class E to C3 residential use.
20. The City Plan 2040 identifies a demand for a minimum of 1.2 million sqm additional office floorspace in the City of London, in line with the City's identification as a nationally important location for globally oriented financial and professional services in the London Plan. LP33 plans to provide for 23,000 new jobs across a range of sectors and to deliver 118,000 m² of new office floorspace by 2033. The majority of this will come forward within the Shoreditch area, the key employment area.
21. The City Fringe/Tech City Opportunity Area (OA) as defined in the London Plan is an important area of employment and economic growth within the London Borough of Hackney, especially for the digital and creative sectors. The OA is adjacent to the City of London and the City Plan 2040 supports the role of the Liverpool Street area as a gateway to the City Fringe/Tech City by encouraging the development of flexible, affordable and collaborative office space suitable for tech start-ups and growing businesses. There is potential to develop further links between Tech City and the City Corporation's Destination City initiative to strengthen the creative ecosystem in both areas.
22. The London Borough of Hackney requires 10% of gross new employment floorspace within major commercial developments to be affordable or low cost workspace. While the City of London does not have a directly equivalent policy, the City Plan supports the provision of flexible workspace to meet the needs of SMEs and encourages developers to consider a range of leasing structures, including below market rents. The City Corporation and the London Borough of Hackney will work collaboratively to ensure that affordable workspace and move-on accommodation needs can be met, including providing signposting and assistance to businesses in finding suitable office accommodation.

Tall buildings and protected views

23. The London Borough of Hackney and the City of London Corporation will continue to work together to ensure that tall buildings are located in suitable areas where adverse impacts on local townscape character and the wider skyline can be prevented. LP33 indicates that taller buildings must respect the setting of historic townscapes and landscapes, including those in adjoining boroughs. Likewise, City Plan 2040 seeks to ensure that any cross-boundary impacts are fully addressed. The City Plan sets out a comprehensive approach to managing tall building proposals in

the Square Mile. Tall buildings in the City are defined as those exceeding 75m AOD in height. Strategic Policy S12 identifies locations (City Cluster and Fleet Valley) and heights for tall buildings areas in the City where tall building development will be considered appropriate. This policy has been informed by detailed heritage impact assessments and strategic visual impact assessment, which demonstrates how the proposed massing of tall buildings in these areas could potentially impact the strategic landmarks and the wider City and pan-London skyline.

24. Two of the Mayor's LVMF linear views of St Paul's Cathedral (from King Henry VIII's Mound, Richmond and from Westminster Pier) extend into the London Borough of Hackney as background Wider Setting Consultation Areas. These views are shown on the Policies Maps produced by the City of London and Hackney. The City Plan seeks to protect and enhance significant City and strategic London views including views of St. Paul's Cathedral, through the implementation of the Mayor of London's London View Management Framework SPG and the City Corporation's St. Paul's Heights code.
25. The City of London and Hackney will continue to cooperate to ensure these strategic views are protected and enhanced.

Culture and visitors

26. The City Plan 2040 seeks the development of a wide range of cultural and leisure facilities across the City, in line with 'Destination City', the City Corporation's flagship strategy, which recognises the crucial role that culture and visitors will play in creating a more vibrant Square Mile. The City Plan is underpinned by the Culture Planning Framework, which provides a broad framework for what culture infrastructure should be provided in the City, and where.
27. The 'Smithfield and Barbican' and 'Liverpool Street Station' have been identified in the City Plan as areas, which are likely to experience significant transformation over the plan period. These 'Key Areas of Change' are located near the southern boundary of the London Borough of Hackney, therefore it is envisaged close cooperation is required for these areas.
28. 'Barbican' is recognised in the London Plan as a strategic cultural area (strategic night-time location of national or international significance). The City Plan encourages culture-led mixed use development on major sites in the Smithfield and Barbican area, along with the promotion of new cultural activity and attractions including proposals for relocation and reopening of the London Museum from London Wall to Smithfield, and in the longer term, the relocation of Smithfield Market and re-use of the existing market buildings for other uses. The Barbican Neighbourhood Forum, designated in July 2023, is in the process of preparing a neighbourhood plan for the area. The City Plan seeks to minimise potential adverse impacts on residential amenity.
29. The Liverpool Street Station area, identified as a 'night-time area of more than local significance' in the London Plan and a 'Key Area of Change' in the City Plan is currently undergoing significant transformation. This change is driven by the recent arrival of the Elizabeth Line; extensive redevelopment and refurbishment of

Broadgate; and the establishment of numerous new offices, as well as retail and leisure facilities in the Liverpool Street area and the adjacent City Cluster – and has resulted in significant increase in tourist and visitor footfall in the area. The City Plan aims to enhance the overall visitor experience of this area by making public realm enhancements and strengthening connectivity to nearby local destinations, while promoting activities seven days a week, contributing to greater vibrancy in the area.

30. The Shoreditch area has a vibrant cultural scene and the London Borough of Hackney is working with developers to establish a major new cultural attraction at The Stage development on the site of Shakespeare's Curtain Theatre in Curtain Road. This mixed-use development will include a heritage centre featuring the remains of the original theatre and a performance space in a sunken amphitheatre and may have synergies with the City Corporation's cultural proposals.
31. LP33 sets out that up-to-date assessments of current and future room demand and supply are used to manage new visitor accommodation. It has been identified that in Hackney significant progress has been made towards meeting visitor accommodation demand to 2041 and that the Hackney priority is for conventional residential.
32. It supports diversification of the evening and night-time economy, with only limited expansion of licensed premises in Shoreditch due to the concentration of such uses which already exists. The City of London has seen strong demand for hotel accommodation in the last ten years, and in 2022 had 43 hotels, apart-hotels and hostels, providing 7,552 bedrooms and a further 33 serviced apartment properties providing 1,551 units. A hotel needs study for the City was carried out in 2022, which assessed the overall need for hotel bedrooms to be 4,012 by 2037. This consists of the forecast pipeline of hotel rooms up to 2030, with additional projected demand of an average of 350 rooms per year beyond that point. Both authorities apply the 'Agent of Change' principle to limit amenity impacts and their policy approaches are complementary.
33. The City of London Corporation and The London Borough of Hackney will cooperate on the delivery of their ambitions for cultural provision to maximise the benefits for this area's rich cultural and heritage infrastructure, and will continue to ensure an appropriate balance in the size, type and distribution of visitor and night-time economy uses as far as possible within the planning use classes framework.

Retail

34. The City Plan supports additional office and retail development in this area and identifies Moorgate/Liverpool Street as a Principal Shopping Centre (PSC), reflecting the designation of Moorgate and Liverpool Street as CAZ retail clusters with high commercial growth potential in the London Plan. The Moorgate/Liverpool Street Principal Shopping Centre has potential to accommodate significant growth of retail provision during the Plan period. The Plan also encourages the extension of retail and leisure activities into evenings and weekends – thereby diversifying the retail offer and creating a shopping and leisure destination to draw a diverse range of audiences. Broadgate is currently developing a more outward looking character and this is expected to continue, alongside further improvements to permeability.

35. The London Borough of Hackney's emerging Future Shoreditch AAP defines key frontages along Bishopsgate / Shoreditch High Street for retail, culture, entertainment and leisure uses in recognition of the London Plan's designation of Shoreditch as both a CAZ specialist cluster for arts, culture and entertainment uses and a CAZ retail cluster. These approaches are complementary and aim to promote continuous active frontages that will enhance the vitality and attractiveness of the corridor between Shoreditch and the City of London.
36. Both authorities are also committed to bringing forward public realm enhancements, urban greening and improvements to walking and cycling provision as resources allow, which will enhance cross-boundary connections and support the retail, hospitality and cultural sectors by encouraging visitors to make repeat visits and dwell for longer periods.

Governance arrangements

1. This Statement has been informed by ongoing engagement between Hackney and the City of London. It has been prepared as a living document, which will be reviewed and updated as necessary and will form a key part of implementation of Local Plan policies and any future Local Plan reviews (for both authorities).
2. Specific officer-level meetings to discuss cross-boundary issues will continue to be held on a regular basis, together with attendance at sub-regional or London wide group and partnership meetings where cross-boundary issues are discussed.
3. Officers in each Local Authority will provide feedback to senior officers on any relevant issues raised in discussions. Likewise, any senior officer level discussions on relevant cross boundary issues will inform discussions.

Timetable for review and ongoing cooperation

4. The following table details the proposed timetable for key stages in the Local Plan review, which will inform timings of future discussions. At these key stages, the Statement of Common Ground will be considered and updated as necessary.

| Borough | Current Local Plan adoption date | Local Plan Review – Reg 18 date | Local Plan Review – Reg 19 date | Local Plan Review – Anticipated submission date |
|-----------------------------------|---|---|--|--|
| London Borough of Hackney | Local Plan - July 2020 Future Shoreditch AAP (Draft) | Timeline to be confirmed through an updated LDS Draft Local Plan Consultation – April 2019 Draft Local Plan Consultation – May 2024 | Timeline to be confirmed through an updated LDS Spring 2025 | Timeline to be confirmed through an updated LDS Summer 2025 |
| City of London Corporation | Local Plan - January 2015 | Issues and Options – Sept 2016 Draft Plan - Nov 2018 | March 2021 March/April 2024 | Autumn 2024 |

Table 1 – Local Plan proposed timescales


Signatures

33. Both parties agree that this Statement is an accurate representation of matters discussed and issues agreed upon. We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between the London Borough of Hackney and the City of London Corporation. The authorities will continue to work collaboratively to address cross-boundary issues and to meet the duty to cooperate.

LONDON BOROUGH OF HACKNEY

Name: Natalie Broughton

Position: Assistant Director of Planning and Building Control



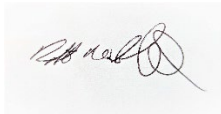
Signature:

Date: March 2024

CITY OF LONDON CORPORATION

Name: Rob McNicol

Position: Assistant Director (Policy and Strategy)



Signature:

Date: March 2024

Appendix 1

| Date | Title/Purpose of meetings | Key actions |
|--------------------|---------------------------------------|---|
| April 14, 2015 | LBH and CoL DTC meeting on Local Plan | |
| February 8, 2016 | LBH and CoL DTC meeting on Local Plan | |
| May 18, 2016 | LBH and CoL DTC meeting on Local Plan | |
| December 14, 2016 | LBH and CoL DTC meeting on Local Plan | |
| September 20, 2017 | LBH and CoL DTC meeting on Local Plan | |
| February 4, 2019 | LBH and CoL DTC meeting on Local Plan | |
| September 18, 2020 | LBH and CoL DTC meeting on Local Plan | |
| June 7, 2023 | LBH and CoL DTC meeting on Local Plan | Update on the Local Plan/Shoreditch AAP |
| November 10, 2023 | LBH and CoL DTC meeting on Local Plan | Finalise SoCG |