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

March 2024

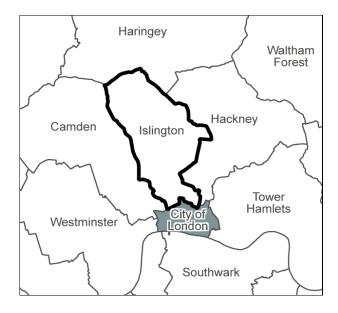


Introduction

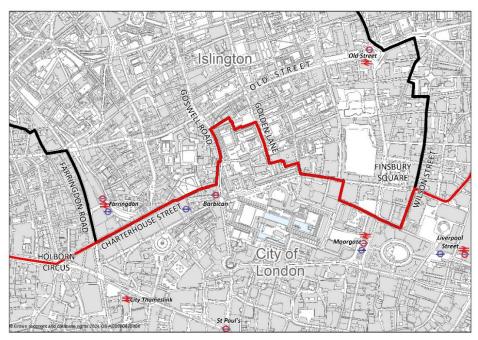
- 1. This document is the Statement of Common Ground (SoCG) between the London Borough of Islington and the City of London Corporation.
- 2. This SoCG applies to the review of the City of London Local Plan (known as City Plan 2040) and to the implementation of the London Borough of Islington Local Plan 2023. It sets out details of the cooperation between Islington and the City of London Corporation during plan preparation and will inform further engagement to ensure effective coordination and implementation of Local Plan policies.
- 3. Islington's new Local Plan was adopted in September 2023 and is made up of three documents: Strategic and Development Management Policies, Site Allocations and the Bunhill and Clerkenwell Area Action Plan.
- 4. The City of London Local Plan was adopted in January 2015. The City Corporation consulted on a full Draft Local Plan between November 2018 and February 2019. In spring 2021, a proposed submission version of City Plan 2036 was consulted on. Further evidence and revisions to the City Plan in 2022 and 2023 were undertaken to address consultation responses and changing economic, social and environmental circumstances.
- 5. The City Corporation will produce a Regulation 19 publication of the Local Plan and Regulation 20 consultation in spring 2024, followed by submission to the Secretary of State in summer 2024.

Geography covered by the Statement of Common Ground

6. The SoCG covers the Local Planning Authority areas of the City of London and the London Borough of Islington. The boundaries of these are shown on Map 1.



Map 1: Location of the City of London and London Borough of Islington



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

London Borough of Islington

- 7. Islington is located in inner London; it borders the City of London, Camden, Hackney to the south, west and east respectively, and the outer London borough of Haringey to the north. It is both a gateway to the commercial heart of the City of Lonon and to the suburbs, with a varied character of the borough reflects this. The borough is less than six square miles in size, making it one of the smallest local authorities in the country (by area). There have been significant population increases in recent years making it one of the most densely populated local authorities in the country.
- 8. A key challenge facing the borough is the contrast within an area which contains both some of the country's most deprived neighbourhoods in close proximity to areas of very considerable wealth. This contrast, and particularly the effects of poverty and lack of affordable housing, are crucial issues for the borough. Islington is also an important employment centre, evidenced by the significant positive net inflow of employees, the fourth highest of all Inner London boroughs. However, business floorspace is the main driver of economic growth in the borough and is considered the best means to meet Islington's significant jobs projections with a projected additional floorspace need for office use of 443,000sqm by 2036.

City of London

9. The City of London, also known as the Square Mile, is a world leading financial and professional services centre and a strategically important office cluster at the heart of the resident population of about 8,600 people is significantly smaller than its daytime working population of approximately 615,000. The City is situated on the north bank of the River Thames and is the ancient core of London with a rich legacy of history. It contains St. Paul's Cathedral, the Monument, the Bank of England and many other well-known landmarks; it adjoins the Tower of London and houses arts and cultural facilities of international renown, including the Barbican Centre. The City is estimated to have attracted 23.3 million international and domestic tourists in 2019.

Key strategic matters

- 10. The City of London Corporation and the London Borough of Islington 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 are listed in Appendix 1. Liaison has also been conducted through pan-London groups such as London Councils and the Association of London Borough Planning Officers (ALBPO).
- 11. The following issues are the key strategic matters with regard to ongoing plan making, although it is noted that there are other issues that may have cross boundary impacts. Islington and the City Corporation are committed to further dialogue moving forward, and not just those limited to periods of plan preparation.
- 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 is part of the development plan for planning authorities in London and Local Plans prepared by the City of London and the London boroughs are required to be in general conformity with it.
- 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 our areas and London and have participated in the development and review of the London Plan.

Housing

- 14. London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The Mayor has carried out a London-wide Strategic Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The City of London Local Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London Boroughs. The City Corporations target is 146 additional residential units per annum up to 2028/29. The target for the plan period is 1,706 units.
- 15. Islington has a target of 775 additional residential units per annum, reflected in the London Plan and new Local Plan. The majority of need for housing in the borough is for genuinely affordable housing. The authorities consider that their London Plan targets 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.

Affordable housing

17. The City Corporation owns and manages a number of housing estates within the borough of Islington. The City Corporation has a programme of infill and redevelopment schemes on these estates to identify suitable sites for delivery of housing in Islington, utilising s106 contributions from residential and commercial developments in the City of London area. Issues such as nomination rights will also be a key part of future discussions.

Gypsy and Traveller accommodation

18. Both authorities are committed to meeting identified needs for Gypsy and Traveller Accommodation where there is an assessed need. It is noted that the City Corporation have no assessed need for Gypsy and Traveller Accommodation. Islington has a need in its Local Plan for 10 pitches and has stated an early focused review on this policy area. Islington will continue to work with the GLA and other boroughs to explore ways to mee identified needs.

Waste

19. Islington is one of the group of seven boroughs that have prepared the North London Waste Plan (NLWP). The NLWP sets out the planning framework for waste management in the seven Boroughs for the next 15 years up to 2036. It identifies sites for waste management use and sets out policies for determining waste planning applications. The NLWP was adopted by the boroughs in 2022. Any requests that can be considered strategically important in relation to the NLWP need to be put to and agreed by all the seven boroughs.

Employment space

- 20. The City of London and the southern part of Islington lie within the Central Activities Zone (CAZ), where the London Plan promotes further economic and employment growth. The continued success of the 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 parts of the CAZ and CAZ fringe in Islington.
- 21. The emerging City Plan 2040 seeks to provide a minimum of 1.2 million sqm of additional office floorspace in the City of London to 2040, in line with the City's identification as a nationally important location for globally oriented financial and professional services in the London Plan. For Islington, the Local Plan identifies a need of 443,000sqm for the plan period. The Council is committed to ensuring there is an adequate supply of business space in line with job growth projections and will protect existing business space throughout the borough through implementing planning policies which seek to ensure, at least, no net loss of business floorspace, and through the making of Article 4 Directions, where appropriate. Intensification, renewal and modernisation of existing space is particularly encouraged. The City Corporation and Islington's approach towards protecting adequate employment space is aligned.

City Fringe Opportunity Area

- 22. Opportunity Areas are capable of accommodating substantial new jobs or homes. The City Fringe Opportunity Areas include parts of Islington, City of London, Hackney, and Tower Hamlets. It is an important area for employment growth in particular and includes the Tech City cluster of digital and creative industries.
- 23. The City Fringe is an important area of economic and employment growth in Islington and the Local Plan 2023 vision for the area aims to maximise opportunities arising from the expansion of the City of London's commercial activities. Islington and the City Corporation agree on the importance of potential in the City Fringe Opportunity Area and Tech City development around Old Street is recognised by the City Corporation as an important growth area.

Tall buildings and protected views

- 24. Tall buildings are an iconic feature of the skyline in parts of the City of London, but by their nature they can have significant impacts. A number of the Mayor's LVMF linear views of St. Paul's Cathedral cross parts of Islington and the City of London; View 1A2 from Alexandra Palace, View 2A1 from Parliament Hill and View 3A1 from Kenwood. These views are shown on the Policies Maps produced by each authority. The protection of views of St. Paul's affects the control of building heights in certain parts of Islington and the City and the two authorities will 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.
- 25. 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.
- 26. Islington's Local Plan identifies specific sites potentially suitable for buildings of 30m or more. Tall buildings must be high quality in accordance with Policy PLAN1. The designs of tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible.
- 27. The City of London and Islington will continue to cooperate to ensure these strategic views are protected and enhanced.

Governance arrangements

28. This Statement of Common Ground has been informed by ongoing engagement between Islington and the Corporation of London. It has been prepared as a living document, which will be reviewed and updated at key points in the plan preparation process for both bodies and will form a key part of implementation of Local Plan policies and any future Local Plan reviews (for both authorities).

- 29. Specific officer-level meetings to discuss cross-boundary issues will continue to be held on a regular basis, (proposed bi-annually, particularly where there are significant cross-boundary issues to discuss). Depending on the status of issues discussed and other factors including ongoing Local Plan reviews, these discussions may inform a revised SoCG.
- 30. Officers in each Local Authority will feedback to senior officers any relevant issues raised in discussions. Likewise, any senior officer level discussions on relevant cross boundary issues will inform discussions.

Signatures

31. 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 Islington 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 ISLINGTON

Name: Sakiba Gurda

Position: Head of Planning Policy and Development Viability Service

Signature:

Date: 30 April 2024

Salite Gurd

CITY OF LONDON CORPORATION

Name: Rob McNicol

Position: Assistant Director (Policy and Strategy)

Signature:

Date: 20/05/2024

Appendix 1 – Liaison meetings between City of London and Islington

29 th April 2015	Islington, Camden, CoL	Peter Shadbolt, Janet Laban	Jonathan Gibb, Karen Montgomerie, Kate Goodman, Brian O'Donnell	Discussed issues relevant to both boroughs.
19 th October 2015	Islington, Camden and CoL	Peter Shadbolt, Lisa Russell	Jonathan Gibb, Matthew Wong, Tom Walsh	Liaison regarding SHMA.
15 th March 2016	Islington, Camden and CoL	Peter Shadbolt, Lisa Russell	Jonathan Gibb, Matthew Wong	Discussed issues relevant to both boroughs.
7 th December 2016	Islington and CoL	Peter Shadbolt, Lisa Russell	Jonathan Gibb, Lisa Russell	Liaison meeting to update Local Plan progress, specifically on hotels.
18 th May 2016	Islington, Tower Hamlets, Hackney and CoL	Peter Shadbolt, Lisa Russell	Jonathan Gibb, Matthew Wong	Discussion on tall building policy.
14 th July 2017	Islington, CoL	Adrian Roche, Lisa Russell	Jonathan Gibb, Robert Scott, Eloise Lobsey	Discussed issues relevant to both boroughs.
2 nd May 2018	Islington, CoL	Adrian Roche, Lisa Russell	Gavin Polkinghorn, Stacey Clark, Mike Carless	Discussed issues relevant to both boroughs.
18 th November 2022	Islington and CoL	Peter Shadbolt and CoL	Jonathan Gibb	Discussed issues relevant to both boroughs.
19 th October 2023	Islington and Tower Hamlets and CoL	Rob McNicol, Lisa Russell	Marissa Ryan- Hernandez, Tom Walsh, Jonathan Gibb, Michael Carless	Discussed issues relevant to both boroughs.